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October 15, 2015

Ms. Jennifer Sutter
Voluntary Cleanup and Portland Harbor Section
Oregon Department of Environmental Quality
700 NE Multnomah St.
Suite 600
Portland, OR 97232

Subject: Third Quarter 2015 Progress Report for EVRAZ Oregon Steel Facility in Portland, Oregon WPMVC-NWR-00-10

Dear Ms. Sutter:

On behalf of EVRAZ Oregon Steel (EOS), Integral Consulting submits to the Oregon Department of Environmental Quality (DEQ) this Third Quarter 2015 Progress Report for the EOS facility in Portland, Oregon, located at 14400 N. Rivergate Blvd. This report is submitted in accordance with Section II.H of the June 2000 Voluntary Remediation Investigation Source Control Measure Agreement (Voluntary Agreement) for the EOS facility. This report documents and discusses the project activities from July 1 through September 30, 2015 (third quarter of 2015). In addition, this report describes activities planned for the fourth quarter of 2015.

Actions Completed During the Third Quarter 2015

Stormwater Source Control

Sediment thickness in the basin remains below the criteria set for cleanout. EOS removed sediment from northernmost compartment of the stormwater clarification basin during the third quarter of 2015. This removal was a preliminary test of a modified sediment pumping approach. The sediment slurry was pumped to a Geotube® where it is dewatering prior to landfill disposal.

Riverbank Source Control

EOS continued implementing the riverbank source control measure during the third quarter of 2015. The source control measure construction is approximately 80% complete. Strider Construction Company completed all berm and bank excavation and approximately 90% of upper beach excavation during the third quarter. Approximately 90% of both the

upper beach and bank were backfilled with clean import material during the third quarter. Berm backfill import material has been approved by DEQ and berm reconstruction is pending identification of an acceptable source for import topsoil material.

Bank soil disposal is ongoing with approximately 85% of bank material disposed of at Riverbend Landfill in McMinnville, Oregon during the third quarter. The remaining bank soil is scheduled for disposal at Riverbend Landfill early in the fourth quarter. Approximately 40% of excavated upper beach soil was managed in the mold basement and compacted to within approximately six inches of surrounding grade. Excavated upper beach soil and berm soil were managed at the north side of the east landfill where they were placed for compaction during the fourth quarter of 2015.

Bank material at the base of the excavation and the base of specific excavated beach areas was sampled for polychlorinated biphenyl (PCB) Aroclors analysis per the design. Bank material was also analyzed for total metals. In addition, beach material at approximately station 7+50 ft was sampled and analyzed for total petroleum hydrocarbons due to a slight hydrocarbon-like odor. Hydrocarbons were not detected in this sample. Analytical results will be provided in the next quarterly progress report after validation (as well as in the construction completion report).

Groundwater Source Control

Three beach and three riverbank wells were sampled during the first quarter of 2015 in the vicinity of a 2012 make-up river water line leak that was repaired in March 2013. A groundwater monitoring report documenting the sampling was submitted to DEQ during the third quarter of 2015.

Per the riverbank source control measure design, six bank wells (MW-5, MW-7, MW-8, MW-9, MW-10 and MW-13) and seven beach wells (MW-14, MW-15, MW-16, MW-17, MW-18, MW-19 and MW-23) were decommissioned in August 2015 during riverbank source control construction activities.

Upland Remedial Action / Risk Assessment

Status of the Upland Human Health Risk Assessment (HHRA) remains unchanged during the third quarter of 2015 due to focus of resources on the riverbank source control measure.

Other

EOS completed cleanup of three reportable upland releases of hydraulic oil to soil during the third quarter. The three spills occurred in mill operational areas and ranged from

approximately 80 to 150 gallons. In all three cases, affected soil was removed and post-excavation confirmation sampling results for oil concentrations remaining in on-site soils were compared to generic remedy guidance from DEQ's 2003 Risk Based Decision Making for the Remediation of Petroleum Contaminated Sites. Results show remaining on-site soils are below all applicable screening criteria. No impacts to catch basins, groundwater or surface water bodies were observed. The Oregon Emergency Response System (OERS) Spill/Release Reports, documenting each release, are attached, and a summary of each release is documented below.

On July 7, 2015, a spill of approximately 150 gallons of hydraulic oil occurred as a result of a ruptured hydraulic hose on a roll line at the Pipe Mill Double Joiner. The spill occurred on a concrete pad under the roll line, and hydraulic oil was released to aggregate soils on the east and west sides of the pad. Absorbents were initially used to contain the oil and remove free product from the ground surface. Approximately 12 cubic yards of spent absorbent material and impacted soil were excavated, removed and disposed of at Riverbend Landfill.

On September 7, 2015, a spill of approximately 100 gallons of hydraulic oil occurred at the Pipe Mill Double Joiner due to a hydraulic valve failure resulting from a pipe that slipped off the roll line and struck the valve causing the spill. Approximately 2 cubic yards of spent absorbent material and impacted soil were excavated, removed and disposed of at Riverbend Landfill.

On September 16, 2015, approximately 80 gallons of hydraulic oil was spilled when a forklift carrying a tote of hydraulic oil hit a pothole and the tote skidded off the forks of the forklift. The tote tipped over, causing the cap to pop off of the tote, releasing oil to surrounding soil. Approximately 5 cubic yards of spent absorbent material and impacted soil were removed and disposed of at Riverbend Landfill.

Problems Experienced During the Third Quarter 2015

No significant problems were encountered during the third quarter of 2015.

Actions Scheduled for the Fourth Quarter 2015

EOS is planning the following source control and upland closure-related activities for the fourth quarter of 2015:

Stormwater Source Control

- Monitor sediment depth accumulation in the stormwater clarification basin
- Conduct stormwater sampling from the Northern Outfall (003). The timing of sampling will be dependent on weather conditions. Should initial sampling results indicate additional stormwater treatment system upgrades are necessary, EOS will confer with DEQ. If upgrades are necessary, loading study sampling will be discontinued and restarted after upgrades are implemented.

Riverbank Source Control

- Finalize placement of bank stabilization materials
- Dispose of remaining excavated bank material at Riverbend Landfill
- Excavate remaining upper beach material and haul to the east landfill for placement
- Finish placement and compaction of beach material along the north side of the east landfill, and cap the compacted beach material with berm fill
- Install marker stakes in the portions of the upper beach and north alcove where post-excavation sampling indicates remaining soils exceed 100 μg/kg for total PCB Aroclors
- Re-construct the berm with imported berm backfill and topsoil
- Re-vegetate the upper beach and re-constructed berm
- Place marker layer and six inches of compacted crushed gravel on the surface of the mold basement fill
- Begin preparation of completion report.

Groundwater Source Control

- Discuss next steps for completing a no further action determination with DEQ.

Upland Remedial Action/Risk Assessment/Feasibility Study

- Finalize revisions to the HHRA and submit to DEQ.

If you have any questions regarding this report, please contact me at (503) 943-3629 or Linda Baker at (206) 957-0314.

Sincerely,

Craig Heimbucher, P.E.
Project Manager

enclosures

cc: Drew Gilpin and Debbie Deetz Silva – EOS
Joan Snyder – Stoel Rives
Loren Dunn – Riddell Williams
Linda Baker – Integral Consulting
Eva DeMaria - EPA
File C1144-202

ATTACHMENT A

OERS REPORTS

SPILL/RELEASE REPORT

State of Oregon Department of Environmental Quality

1 - GENERAL INFORMATION **OERS No.** 2015-1487

a. Company/Individual Name: EVRAZ

b. Address: 14400 N. Rivergate Blvd

Portland, OR 97203

c. Company Contact Person: Debbie Deetz Silva

d. Phone Number(s): 503-978-6044

e. Specific on-site location of the release (and address if different from above):

Double Joiner.

Please provide a map of the site showing area(s) where the release occurred, any sample collection locations, location of roads/ditches/surface water bodies, etc.

2 - RELEASE INFORMATION

a. Date/Time Release started: 7-07-2015 ~6:00 PM Date/Time stopped: 7-07-2015 ~6:01 PM

b. Release was reported to (specify Date/Time/Name of Person contacted where applicable):

ODEQ 7-07-2015 ~6:30 PM –with DEQ follow-up

OERS 7-07-2015 ~6:30 PM – OERS No. 15-1487

NRC Not Applicable – waters of the state not involved

Other (describe):

c. Person(s) reporting release: Andrew Gilpin

d. Name, quantity and physical state (gas, liquid, solid or semi-solid) of material(s) released:

Approximately 150 gallons of hydraulic fluid.

Please attach copies of material safety data sheets (MSDS) for released material(s).

e. The release affected: _____ Air _____ Groundwater _____ Surface Water __X__ Soil _____ Sediment

f. Name and distance to nearest surface water body(s), even if unaffected (include locations of creeks, streams, rivers and ditches that discharge to surface water on maps):

The spill occurred approximately 2240 feet East from the Willamette River

Has the release reached the surface water identified above?: ____Yes _X_No

Could the release potentially reach the surface water identified above? ____Yes _X_No

Explain: Facilitie's storm drain system was not affected. The impacted soils have been removed to the extent possible.

g. Depth to nearest aquifer/groundwater: 30-35 feet

Is nearest aquifer/groundwater potable (drinkable)? ____Yes __X_No

Has the release reached the nearest aquifer/groundwater? ____Yes _X_No

Explain: The released hydraulic fluid was contained and cleaned up. Impacted soils have been removed to the extent possible.

h. Release or potential release to the air occurred? ____Yes __X_No
Explain:___No atomization occurred during or after the spill incident.__

i. Was there a threat to public safety? ____Yes __X_No
j. Is there potential for future releases? ____Yes _X__No
Explain:_A hydraulic hose failed on a roll line at the Pipe Mill Double Joiner. The hose line has been repaired thus eliminating the potential for a future release from this line
k. Describe other effects/impacts from release (emergency evacuation, fish kills, etc.):
___None_

l. Describe how the release occurred. Include details such as the release source, cause, contributing weather factors, activities occurring prior to or during the release, dates and times of various activities, first responders involved in containment activities, etc.:

___On 7/07/2015, at approximately 6:00 PM, a hydraulic hose on the roll line at the Pipe Mill Double Joiner facility failed. Approximately 150 gallons of Blue Star HL 6890/46 lubricant oil was released to a concrete pad underneath the roll line. Some of the oil was released to the aggregate soils on both the east and west sides of the concrete pad. Absorbents were initially used to contain the released lubricant oil from the ground surface. Spent absorbent material and affected soils (approximately 12 cubic yards) were removed to the extent possible by outside contractor, Terra Hydr. Initial excavation of the affected area took place on 7/7/2015. Subsequent excavation of the affected area was performed on 7/12/2015 after issuance of an EVRAZ internal excavation permit was completed. The weather was sunny and dry. Excavated soils were covered and stored in an on site containment area prior to disposal. The hydraulic line that caused the release was replaced the same day as the spill on 7/7/2015. Select import granular material was placed in the excavated area and compacted. Affected media was disposed of at the Riverbend Landfill on 7/31/2015.

3 - SITE INFORMATION

a. Adjacent land uses include (check all that apply and depict on site maps):
____Residential ____Commercial ____Light Industrial __X_Heavy Industrial
____Agricultural ____Other (describe):_____
b. What is the population density surrounding the site:_____N/A_____
c. Is the site and/or release area secured by fencing or other means? _X_Yes ____No
d. Soil types (check all that apply): __X_alluvial ____ bedrock ____ clay _X__sandy
_X__silt ____ silty loam ____artificial surface (cement/asphalt/etc.)
e. Describe site topography:___Predominantly flat._____

4 - CLEANUP INFORMATION

a. Was site cleanup performed? __X_ Yes ____No
   If No, explain:_____
   _____

b. Who performed the site cleanup?
   Company Name: __Terra Hydr_____
   Address: _____PO Box 3616_____
   _____Portland, OR 97208_____
   Cleanup Supervisor: _Hank Stukey_____
   Phone Number(s): ____503-625-4000_____

c. Has all contamination been removed from the site? _X_ Yes ____No
   If No, explain:_____
   _____

d. Estimated volume of contaminated soil removed:____12 cubic yards____

e. Estimated volume of contaminated soil left in place: unknown if any – impacted soils were removed to the extent possible.

f. Was a hazardous waste determination made for cleanup materials? __X_ Yes ____No

g. Based on the determination, are the cleanup materials hazardous wastes?
   ____Yes __X_ No If Yes, list all waste codes:_____

h. Was contaminated soil or water disposed of at an off-site location? __X_ Yes ____No
   If yes, attach copies of receipts/manifests/etc., and provide the following information:
   Facility Name: ____Riverbend Landfill__
   Address: _____13469 SW Highway 18____
   _____McMinnville, Oregon 97128-8634__
   Facility Contact: ____Mark Krening_____
   Phone Number(s): ____(503) 519-3959_____

i. Is contaminated soil or water being stored and/or treated on-site? ____Yes _X__No
   If yes, please describe the material(s), storage and/or treatment area, and methods utilized (attach additional sheets if necessary):
   _____
   _____

j. Describe cleanup activities including what actions were taken, dates and times actions were initiated and completed, volumes of contaminated materials that were removed, etc. (attach additional sheets or contractor reports if necessary or more convenient):

___See contractor (Terra Hydr) spill clean up report attached. Spill was immediately contained with absorbents. Affected soils were excavated immediately after the release occurred on July 7th, 2015 to a depth of 6 inches with subsequent excavation performed on July 12th, 2015 to a depth of 2 feet. Approximately 12 cubic yards of excavated soils were stockpiled and covered prior to disposal July 31, 2015.

5 - SAMPLING INFORMATION

Attach copies of all sample data and indicate locations of sample collection on maps.

a. Were samples of contaminated soil collected? _X_ Yes ____No ____N/A
b. Were samples of contaminated water collected? ____Yes ____No _X__N/A
c. Were samples collected to show that all contamination had been removed? _X__Yes ____No __N/A
d. Describe sampling activities, results and discuss rationale for sampling methods:

A two point grab sample was collected from the east and west sides of the excavated area where the spill occurred. The two grab samples were composited and a single sample was sent to Specialty Analytical for analysis for NWTPH-DX.

6 - SPILL REPORT CHECKLIST

To ensure that you have gathered all the information requested by the Department in this Spill/Release Report, please complete the following checklist:

_X___Map(s), pre and post cleanup photos of the of the site showing buildings, roads, surface water bodies, ditches, waterways, point of the release, extent of contamination, areas of excavation and sample collection locations attached.

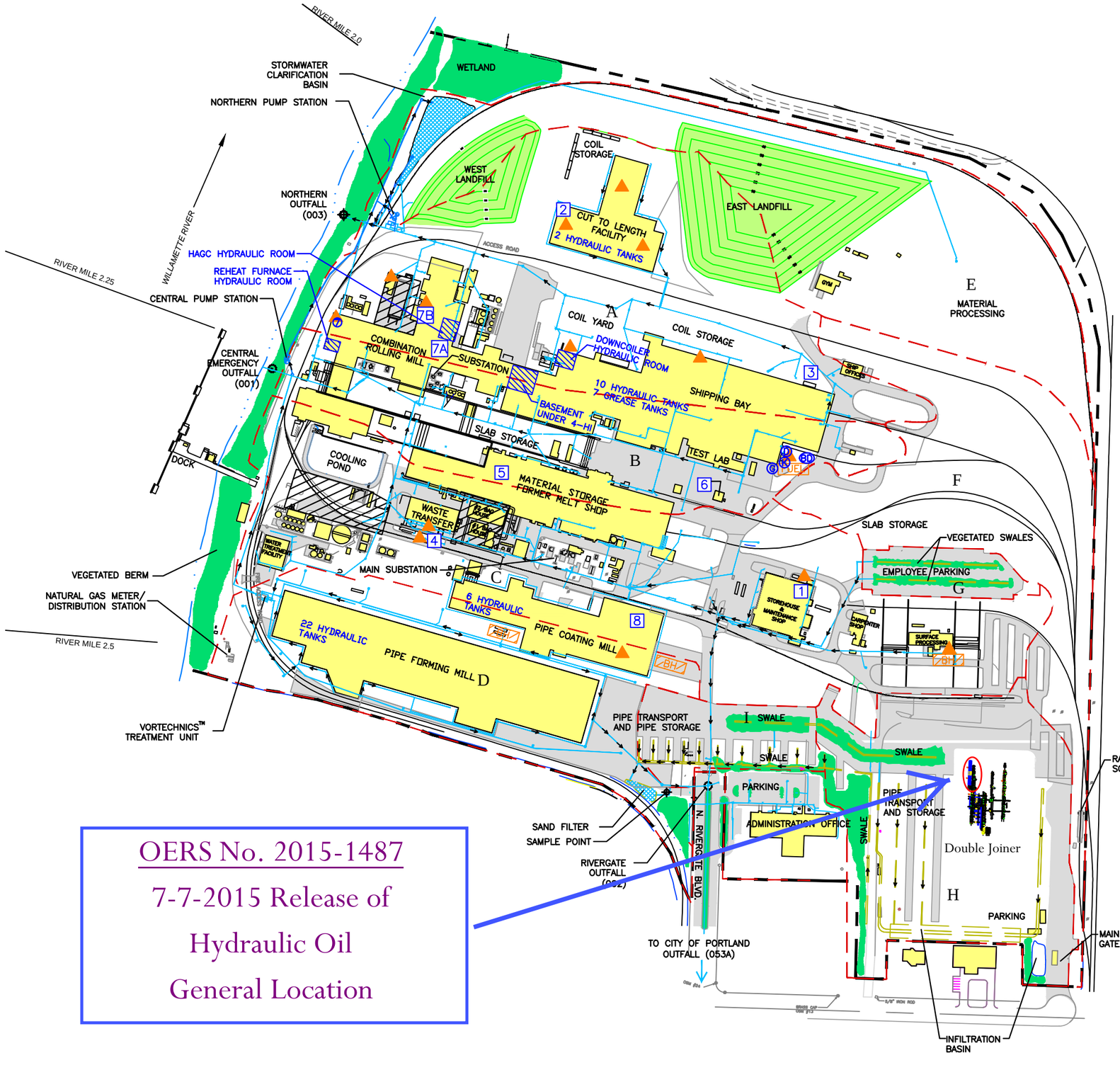
_X__ Material Safety Data Sheet (MSDS) for released material(s) attached. **Note: an MSDS is not required for motor fuels.**

_X__ Sampling data/analytical results attached.

_X__ Receipts/manifests (if any) for disposal of cleanup materials attached.

_X__ Contractor reports (if any) attached.

If you would like to submit your report by e-mail it can be submitted electronically to: DOSPILLS@deq.state.or.us



OERS No. 2015-1487

7-7-2015 Release of Hydraulic Oil General Location

175 0 350

1"=350'

LEGEND

- ABOVEGROUND STORAGE TANK – FUEL (SEE NOTE)
- CONTAINER STORAGE AREA
- HYDRAULIC ROOM
- BAG HOUSE
- SPILL KIT
- DRAINAGE BASIN
- STORM DRAIN SYSTEM
- SWALE
- DRAINAGE FLOW DIRECTION
- BUILDING/STRUCTURE
- PAVEMENT/CONCRETE
- AREA DRAINS TO COOLING POND
- VEGETATION
- LANDFILL GRASS COVER
- MEAN HIGH WATER LEVEL 9.6ft NGVD
- RAILROAD

NOTE: BD – BIODIESEL, D – DIESEL, G – GASOLINE, K – KEROSENE

DRAINAGE BASIN SURFACE AREAS (ACRES)

DRAINAGE BASIN	TOTAL AREA	BUILDINGS	PAVEMENT	TOTAL IMPERVIOUS	TOTAL PERVIOUS	DRAINS TO
A	24.7	6.5	1.8	8.3	16.4	003
B	13.6	6.3	1.8	8.1	5.5	003
C	27.3	6.6	8.3	14.9	12.4	003
D*	15.3	6.7	1.68	8.38	6.92	4.4 acres to 002; 10.9 to 003
E	20.3	0.1	0	0.1	20.2	003
F	14.1	0	0.4	0.4	13.7	infiltrates
G	1.8	0	1.06	1.06	0.74	002
H	14.6	0.06	6.11	6.17	8.43	infiltrates
I	3.2	0	2.15	2.2	1.0	002
TOTAL	135	26	23	50	85	

* SPIRAL PIPE MILL BUILDING AREA = 240,300 ft² (5.5 acres). 20% OF SPIRAL PIPE MILL ROOF RUNOFF DISCHARGES TO NORTHERN OUTFALL 003 AND 80% DISCHARGES TO RIVERGATE OUTFALL 002.

SURFACE AREA (ACRES) DRAINING T O EACH OUTFALL

SURFACE	OUTFALL: CENTRAL EMERGENCY 001	OUTFALL: RIVERGATE 002	OUTFALL: NORTHERN 003	TOTAL
PERVIOUS	0	1.2	63.2	64
IMPERVIOUS	0	8.2	33.6	42
TOTAL	0	9	97	106

NOTE: BASINS F AND H (28.7 ACRES) DO NOT DRAIN TO OUTFALLS
1) RIVERGATE 002 INCLUDES BASINS G,I AND 80% OF PIPE MILL ROOF RUNOFF.
2) NORTHERN 003 INCLUDES BASINS A,B,C,D, AND E, EXCLUDING 80% OF PIPE MILL ROOF RUNOFF.

EVRAZ PORTLAND - RIVERGATE

14400 N Rivergate Blvd
Portland, OR 97203

DATE: 5/9/2013 | DRWN: BTS | **FIGURE 2**

OERS No. 2015-1487 -
Spill affected area
looking WEST

EVRAZ - Portland
14400 N Rivergate Blvd.
Portland, OR 97203

OERS No. 2015-1487 -
Spill affected area
looking EAST

EVRAZ - Portland
14400 N Rivergate Blvd.
Portland, OR 97203

Material Safety Data Sheet

Section 1 Product and Company Identification

Manufacturer
Blue Star Lubrication Technology®, LLC
915 N. Plum Grove Road, Suite C
Schaumburg, IL 60173
United States of America
Phone: 847-285-1888 Fax: 847-285-1894

Emergency Phone Numbers
847-285-1888 Normal Business Hrs.
USA & Canada Chemtrec 800-424-9300
International Chemtrec 703-527-3887

Recommended Usage: Formulated Industrial Lubricant
Other Identifier: Mixture

Product Name: Blue Star® HL 6890/46

Section 2 Hazards Identification

Classification of the Mixture: Light yellow to amber liquid. Mild ester odor.
Most Important Hazards: This material is considered moderately hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200). May cause respiratory tract, skin and eye irritation. May cause skin sensitization with susceptible individuals. May be harmful if swallowed.
Hazard Classification:
Causes eye and skin irritation – Category 2
May cause allergic skin reaction – Category 1
Signal Word: Warning!
Pictograms:

Precautionary Statements:
Inhalation - Avoid breathing dust/fume/gas/mist/vapors/spray. Keep container tightly closed. Use only with adequate ventilation.
Skin – Avoid contact with skin and clothing. Wash thoroughly after handling.
Eyes - Avoid contact with eyes. Wash thoroughly after handling.
Ingestion – May be fatal if swallowed and enters airways.
Quantity of Ingredients with Unknown Acute Toxicity: 0.0%

Section 3 Composition Information on Ingredients

Ingredient	WT %	CAS #
2-t-butylhydroquinone	< 1	1948-33-0

BLUE STAR
Lubrication Technology

Section 4 First Aid Measures

Eyes: Flush eyes with running water for at least 15 minutes. If redness, burning, blurred vision or irritation persists, transport to nearest medical facility for additional treatment.
Skin: Flush skin with water, wash with soap and water. If irritation occurs, get medical attention. Remove contaminated clothing and wash before reuse. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.
Ingestion: Do NOT induce vomiting and obtain medical attention. Have victim rinse mouth out with water. If vomiting occurs spontaneously, keep head below hips to prevent aspiration.
Inhalation: Remove victim to fresh air and keep at rest in a position comfortable for breathing. If the victim has difficulty breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Section 5 Fire Fighting Measures

Flammable Properties:
Flash point: > 210°C (ASTM D56) Flammable limits in air: N/E Auto ignition temperature: N/E
Extinguishing media: CO_2, dry chemical, foam
Special firefighting measure:
The material as received will not support combustion, however its residues may; therefore, procedures for an oil fire should be followed. Use self-contained breathing apparatus. Use foam or dry chemical to extinguish fire. Water may be used only to keep surrounding containers cool. Firefighters should wear proper protective equipment and self-contained breathing apparatus with full face piece operated in positive pressure mode.

Section 6 Accidental Release Measures

- **Eliminate ignition sources and ventilate area.**
- **Absorb spillage with inert absorbent material.**
- **Contain spill and keep from entering waterways or sewers.**
- **Advise EPA/state agency if required.**
- **Use proper personal protective equipment for clean-up.**
- **Treat contaminated absorbent same as spilled product.**

Section 7 Handling and Storage

Handling and Storage Precautions: Avoid heat, open flames, including pilot lights, and strong oxidizing agents. Use explosion-proof ventilation to prevent vapor accumulation. Ground all handling equipment to prevent sparking. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Have appropriate fire extinguishers and spill clean-up equipment in or near storage area.
Work/Hygienic Practices: Wash with soap and water before eating, drinking, smoking, applying cosmetics, or using toilet. Launder contaminated clothing before reuse. Properly dispose of contaminated leather articles such as shoes or belts that cannot be decontaminated. Contaminated leather articles including shoes cannot be decontaminated and should be destroyed to prevent reuse.

Section 8 Personal Protection/ Exposure Controls

Engineering Controls: Use adequate ventilation to keep vapors and mists of this material below applicable standards. Recommended work place control parameters - based on oil mists OSHA TWA 5 mg/m^3.
Respiratory Protection: If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, an approved respirator must be worn. Respirator selection, use and maintenance should be in accordance with the requirements of the OSHA Respiratory Protection Standard, 29 CFR 1910.134.
Skin Protection: Use protective clothing that is chemically resistant to this product. Acceptable materials for gloves and aprons are: neoprene, nitrile rubber or viton.
Eye Protection: Use safety glasses or goggles. Have suitable eye wash water available.
Other/General Protection: For mists and vapors: Air Purifying, organic vapor cartridge, NIOSH approved respirator. Use self-contained breathing apparatus for environments with unknown concentrations or emergency situations.

BLUE STAR
Lubrication Technology

Section 9 Physical and Chemical Properties

Color:	Amber to light yellow	**Vapor Pressure:**	N/E	**Solubility in Water:**	Negligible
Appearance:	Clear Liquid	**% Volatile by Volume:**	N/E	**Evaporation Rate**	
Odor:	Mild ester odor	**Vapor Density (air = 1):**	N/E	**(butyl acetate = 1):**	N/E
Boiling Point:	> 235° C	**Reactivity in Water:**	Non-reactive	**Specific Gravity:**	0.865 – 0.885

Section 10 Stability and Reactivity

Stability: Stable **Conditions to avoid:** Sources of ignition. **Incompatibility:** Strong oxidizing or reducing agents.
Decomposition Products: Oxides of Carbon and Hydrogen. **Hazardous Polymerization:** Will not occur.

Section 11 Toxicological Information

Likely Routes of Exposure: Inhalation, skin, eyes and ingestion.
Potential Health Effects:
Eye Effects: May cause eye irritation.
Skin Effects: May cause slight skin irritation. Based upon data from similar materials, prolonged or repeated skin contact as from clothing wet with material may cause dermatitis. Symptoms may include redness, edema, drying, and cracking of the skin.
Oral Effects: Harmful if swallowed, may cause gastrointestinal tract irritation, nausea and vomiting if mixture is swallowed.
Inhalation Effects: Harmful if inhaled. May cause respiratory tract irritation.
Chronic Health Effects: Repeated skin contact may cause dermatitis or skin acne. Excessive inhalation of oil mist may cause accumulation of mineral oil in lungs accompanied by pulmonary fibrosis.
Mutagenicity: Negative
Carcinogenicity: This mixture contains mineral oils which are considered to be severely refined and not considered to be carcinogenic under IARC. All the oils in this mixture have been demonstrated to contain less than 3% extractable's by the IP 346 test.
Reproductive Effects: Negative
Teratogenicity: Negative
Sensitization: Potential Skin Sensitizer Category 1. 2-t-butylhydroquinone may cause allergic skin reaction.
Toxicological Data:

ATE oral is > 2,000 mg/kg
ATE dermal is >2,000 mg/kg
ATE inhalation (aerosol) is estimated at 5.2 mg/L/4 hour

Section 12 Ecological Information

Not classified due to inadequate data available on this mixture. Recommend avoidance of release to the environment.

Section 13 Disposal Considerations

Avoid release to the environment. Dispose in a safe manner in accordance with national, state and local regulations. Not a RCRA hazardous waste if uncontaminated. If “used” RCRA criteria must be determined. Dispose of container by recycling or if permitted incineration.

Section 14 Transportation Information

Proper Shipping Name: Lubricating Oils. N.O.S.
Shipping Class: 65
Dot Identification Number: Not applicable
Dot Shipping Label: Not regulated by DOT.
TDG Classification: Not controlled under TDG (Canada).

BLUE STAR
Lubrication Technology

Section 15 Regulatory Information

U.S. Federal Regulatory Information:
SARA 302 Threshold Planning Quantity: N/A SARA 304 Reportable Quantity: N/A
SARA 311 Categories:

Acute Health Effects:	Yes
Chronic Health Effects:	No
Fire Hazard:	No
Sudden Release of Pressure Hazard:	No
Reactivity Hazard:	No

EPA/TSCA Inventory: The components of this product are listed on the EPA/TSCA inventory of chemicals.
EPA Hazard Classification Code: Not applicable
CERCLA: No chemicals in this product are subject to the reporting requirements of CERCLA.
SARA Title III - Section 313 Supplier Notification: No Chemicals in this product exceed the DE Minimus reporting level established by SARA Title III, Section 313 and 40 CFR 372.
WHMIS Classification: WHMIS controlled. Class D; Division 2, Subdivision B: otherwise causing toxic effects.
Other Regulations: All components of this formulation are listed on the CEPA-DSL (Domestic Substance List)

Section 16 Other Information

NFPA Hazard Rating:

Health:	**1**	**Slight**
Flammability:	**1**	**Negligible**
Reactivity:	**0**	**Negligible**

SDS Dated: 6/22/2015
***Threshold Limit Value/Personal Exposure Limit
N/A = Not Applicable
N/E = Not Established

Disclaimer of Express or Implied Warranties
The information contained herein is based upon data believed to be reliable and reflects our best professional judgment. Although reasonable care has been taken in the preparation of this document, we extend no warranties and make no representations as to the accuracy of completeness of the information contained therein and assume no responsibility regarding the suitability of this information for the user's intended purpose or for the consequence of its use. Each individual should make a determination as to the suitability of the information for his/her particular purpose(s).

Specialty Analytical

11711 SE Capps Road, Ste B
Clackamas, Oregon 97015
TEL: 503-607-1331 FAX: 503-607-1336
Website: www.specialtyanalytical.com

July 20, 2015

Debbie Deetz Silva
EVRAZ
14400 N Rivergate Blvd
Portland, OR 97203

TEL: (503) 978-6044
FAX: (503) 978-4922

RE: Soil Confirmation Sample / OEM 2015-1487

Dear Debbie Deetz Silva: Order No.: 1507097

Specialty Analytical received 1 sample(s) on 7/16/2015 for the analyses presented in the following report.

There were no problems with the analysis and all data for associated QC met EPA or laboratory specifications, except where noted in the Case Narrative, or as qualified with flags. Results apply only to the samples analyzed. Without approval of the laboratory, the reproduction of this report is only permitted in its entirety.

If you have any questions regarding these tests, please feel free to call.

Sincerely,

Marty French
Lab Director

Specialty Analytical

Date Reported: 20-Jul-15

CLIENT: EVRAZ
Project: Soil Confirmation Sample / OEM 2015-1487

Lab Order: 1507097

Lab ID: 1507097-001
Client Sample ID: OEM 2015-1487

Collection Date: 7/12/2015 9:30:00 AM
Matrix: SOIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
NWTPH-DX		**NWTPH-DX**				Analyst: **BS**
Diesel	ND	16.3	A3	mg/Kg-dry	1	7/20/2015 11:55:12 AM
Lube Oil	527	54.2		mg/Kg-dry	1	7/20/2015 11:55:12 AM
Surr: o-Terphenyl	107	50-150		%REC	1	7/20/2015 11:55:12 AM

QC SUMMARY REPORT

WO#: **1507097**

Specialty Analytical

20-Jul-15

Client: EVRAZ

Project: Soil Confirmation Sample / OEM 2015-1487 **TestCode:** **NWTPHDX_S**

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21151**

Client ID: **CCV** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282524**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	989	15.0	999.0	0	99.0	85	115				
Lube Oil	500	50.0	499.5	0	100	85	115				

Sample ID: **MB-9764** SampType: **MBLK** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **7/17/2015** RunNo: **21151**

Client ID: **PBS** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282525**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.0									
Lube Oil	ND	50.0									
Surr: o-Terphenyl	32.1		33.33		96.2	50	150				

Sample ID: **LCS-9764** SampType: **LCS** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **7/17/2015** RunNo: **21151**

Client ID: **LCSS** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282526**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	156	15.0	166.7	0	93.4	76.3	125				
Lube Oil	175	50.0	166.7	0	105	69.9	127				

Sample ID: **1507076-002ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **7/17/2015** RunNo: **21151**

Client ID: **ZZZZZZ** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282529**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Qualifiers:

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1507097**

Specialty Analytical

20-Jul-15

Client: EVRAZ

Project: Soil Confirmation Sample / OEM 2015-1487 **TestCode:** **NWTPHDX_S**

Sample ID: **1507076-002ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **7/17/2015** RunNo: **21151**

Client ID: **ZZZZZZ** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282529**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	16.8						0	0	20	
Lube Oil	57.4	56.1						55.29	3.75	20	RF

Sample ID: **1507076-005ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **7/17/2015** RunNo: **21151**

Client ID: **ZZZZZZ** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/17/2015** SeqNo: **282533**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	17.1						0	0	20	
Lube Oil	ND	57.0						0	0	20	

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21151**

Client ID: **CCV** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/20/2015** SeqNo: **282543**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1110	15.0	999.0	0	112	85	115				
Lube Oil	533	50.0	499.5	0	107	85	115				

Sample ID: **CCB** SampType: **CCB** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21151**

Client ID: **CCB** Batch ID: **9764** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **7/20/2015** SeqNo: **282544**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	15.2	15.0									

Qualifiers:

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

O RSD is greater than RSDlimit

R RPD outside accepted recovery limits

S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1507097**

20-Jul-15

Specialty Analytical

Client: EVRAZ

Project: Soil Confirmation Sample / OEM 2015-1487 **TestCode:** **NWTPHDX_S**

Sample ID: **CCB**	SampType: **CCB**	TestCode: **NWTPHDX_S**	Units: **mg/Kg**	Prep Date:	RunNo: **21151**
Client ID: **CCB**	Batch ID: **9764**	TestNo: **NWTPH-Dx**	**SW3545A**	Analysis Date: **7/20/2015**	SeqNo: **282544**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lube Oil	ND	50.0									
Surr: o-Terphenyl	31.5		33.30		94.7	50	150				

Sample ID: **CCV**	SampType: **CCV**	TestCode: **NWTPHDX_S**	Units: **mg/Kg**	Prep Date:	RunNo: **21151**
Client ID: **CCV**	Batch ID: **9764**	TestNo: **NWTPH-Dx**	**SW3545A**	Analysis Date: **7/20/2015**	SeqNo: **282547**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1480	15.0	1332	0	111	85	115				
Lube Oil	675	50.0	666.0	0	101	85	115				

Qualifiers:

B	Analyte detected in the associated Method Blank	H	Holding times for preparation or analysis exceeded	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	R	RPD outside accepted recovery limits	S	Spike Recovery outside accepted reco

KEY TO FLAGS

Rev. May 12, 2010

A	This sample contains a Gasoline Range Organic not identified as a specific hydrocarbon product. The result was quantified against gasoline calibration standards
A1	This sample contains a Diesel Range Organic not identified as a specific hydrocarbon product. The result was quantified against diesel calibration standards.
A2	This sample contains a Lube Oil Range Organic not identified as a specific hydrocarbon product. The result was quantified against a lube oil calibration standard.
A3	The result was determined to be Non-Detect based on hydrocarbon pattern recognition. The product was carry-over from another hydrocarbon type.
A4	The product appears to be aged or degraded diesel.
B	The blank exhibited a positive result great than the reporting limit for this compound.
CN	See Case Narrative.
D	Result is based from a dilution.
E	Result exceeds the calibration range for this compound. The result should be considered as estimate.
F	The positive result for this hydrocarbon is due to single component contamination. The product does not match any hydrocarbon in the fuels library.
G	Result may be biased high due to biogenic interferences. Clean up is recommended.
H	Sample was analyzed outside recommended holding time.
HT	At clients request, samples was analyzed outside of recommended holding time.
J	The result for this analyte is between the MDL and the PQL and should be considered as estimated concentration.
K	Diesel result is biased high due to amount of Oil contained in the sample.
L	Diesel result is biased high due to amount of Gasoline contained in the sample.
M	Oil result is biased high due to amount of Diesel contained in the sample.
MC	Sample concentration is greater than 4x the spiked value, the spiked value is considered insignificant.
MI	Result is outside control limits due to matrix interference.
MSA	Value determined by Method of Standard Addition.
O	Laboratory Control Standard (LCS) exceeded laboratory control limits, but meets CCV criteria. Data meets EPA requirements.
Q	Detection levels elevated due to sample matrix.
R	RPD control limits were exceeded.
RF	Duplicate failed due to result being at or near the method-reporting limit.
RP	Matrix spike values exceed established QC limits; post digestion spike is in control.
S	Recovery is outside control limits.
SC	Closing CCV or LCS exceeded high recovery control limits, but associated samples are non-detect. Data meets EPA requirements.
*	The result for this parameter was greater that the maximum contaminant level of the TCLP regulatory limit.

CHAIN OF CUSTODY RECORD

Specialty Analytical
11711 SE Capps Road
Clackamas, OR 97015
Phone: 503-607-1331
Fax: 503-607-1336

Contact Person/Project Manager: Debbie Deetz Silva
Company: EVRAZ
Address: 14400 N Rivergate Blvd
Portland, OR 97203
Phone: 503-978-6044 Fax: 503-978-4922
Project No.: OEM 2015-1487 Project Name: Soil confirmation sample
Project Site Location OR: XX WA: Other:
Invoice To: Accounts Payable - EVRAZ above address P.O. No.: PO # 148521

Collected By: Terra Hydr
~~Signature~~
Printed: Debbie Deetz Silva
Signature: Debbie Deetz Silva
Printed:

Turn Around Time
☑ Normal 5-7 Business Days
☐ Rush _____
Specify
Rush Analyses Must Be Scheduled With The Lab In Advance

For Laboratory Use
Lab Job No.: 150709M
Shipped Via: Spec
Air Bill No.:
Temperature On Receipt: Amb °C
Specialty Analytical Containers? ☐/☐
Specialty Analytical Trip Blanks? ☐/☐

Date	Time	Sample I.D.	Matrix	No. of Containers	Analyses: Northwest TPH - DX	Comments	Lab I.D.
7-12-2015	9:30 AM	OEM 2015-1487	soil	1	X	please hold sample for possi	
						further analysis based on re	
						Composite Sample please m	

Relinquished By: Bobbi Stout
Company: EVRAZ
Date: 7/16/15 Time: 12:13p

Received By:
Company: Specialty

Relinquished By:
Company: Specialty

Date: 7/16/15 Time: 1:57

Received For Lab By: Nikki Rapper
Date: 7/16/15 Time: 1353

Unless Reclaimed, Samples Will Be Disposed of 60 Days After Receipt.
Samples held beyond 60 days subject to storage fee(s)

Copies: White-Original Yellow-Project File Pink-Customer Copy

Riverbend Landfill
13469 SW HIGHWAY 18,
MCMINNVILLE, OR, 97128-8634
Ph: (503) 472-8788

Reprint Ticket # 1018879

Customer Name	EVRAZ OREGON STEEL	Carrier	CELORIE CELORIE BROTHERS
Ticket Date	08/07/2015	Vehicle#	11 Volume
Payment Type	Credit Account	Container	
Manual Ticket#		Driver	
Hauling Ticket#		Check#	
Route		Billing#	0001071
StateWasteCode		Gen EPA ID	
Manifest	NA	Grid	
Destination			
PO#	152857		
Profile	119035OR(Fuel Oil Impacted Soil/Debris)		
Generator	1756536 OR-EVRAZ OREGON STEEL		

	Time	Scale	Operator	Inbound			
In	08/07/15 11:10:11 AM	Inbound	Ashley		Gross	98940	lb
Out	08/07/15 11:21:53 AM	Outbound	Ashley		Tare	40020	lb
					Net	58920	lb
					Tons	29.46	

Comments

Products	LD%	Qty	UOM	Rate	Fee	Amount	Origin
Cont Soil Pet-RGC-Tons-Cont. Soil	100	29.46	Tons	[redacted]		[redacted]	MULT-IN ME
TRKF-Trucking Fee	100	29.46	Tons				

Total Fees

Driver's Signature _____

Total Ticket $933.36

TERRA HYDR INC.

July 25, 2015

Ms. Debbie Deetz-Silva
Evraz Oregon Steel Mills
14400 N Rivergate Blvd
Portland OR 97203

RE: Spill Response at Pipe Jointer

On Tuesday, July 07, 2015 Terra Hydr Inc responded to a hydraulic oil release at the pipe jointer roll line. We were informed that a hydraulic line had failed, releasing approximately 150 gallons of fluid. Evraz employees had previously placed granular sorbent material over the spill area. Spill area was limited to the top of the pad and two areas of varying width by approximately 15' long, on either side of the pad.

THI mobilized a vacuum trailer to evac oil and sorbent material from the top of the concrete pad, and a hydraulic excavator to excavate aggregate material from both sides of the pad. Initial mechanical excavation was limited to approximately six inches (6") BGS, pending utility locates and issuance of an Evraz excavation permit. Approximately nine cubic yards (9 CY) of PCS was removed and transported to the on-site storage area for disposal by others.

THI remobilized on June 12th, after issuance of excavation permit to complete clean-up and site restoration. Mobilization included a Guzzler NX vacuum truck to remove an additional approximate three cubic yards (3 CY) from sides of concrete pad, to approximately 2' BGS. This material was placed on-site with previously excavated material. Confirmation samples were obtained and delivered to Evraz for analytical processing by others.

Site restoration was completed by supplying and placing approximately twenty tons (20 TN) of select import granular material, with compaction.

We appreciate the opportunity to be of service to Evraz on this project. Please contact us at your earliest convenience, should you require additional information.

Sincerely,

Henry J Stukey

SPILL/RELEASE REPORT

State of Oregon Department of Environmental Quality

1 - GENERAL INFORMATION **OERS No.** 2015-2056

a. Company/Individual Name: EVRAZ

b. Address: 14400 N. Rivergate Blvd
Portland, OR 97203

c. Company Contact Person: Debbie Deetz Silva

d. Phone Number(s): 503-978-6044

e. Specific on-site location of the release (and address if different from above):
Double Joiner – West Side

Please provide a map of the site showing area(s) where the release occurred, any sample collection locations, location of roads/ditches/surface water bodies, etc.

2 - RELEASE INFORMATION

a. Date/Time Release started: 9-7-2015 ~11:20 PM Date/Time stopped: 9-7-15~11:25 PM

b. Release was reported to (specify Date/Time/Name of Person contacted where applicable):

ODEQ 9-8-15 ~ 7:10 AM with DEQ follow-up

OERS 9-8-2015 ~ 12:45 AM – OERS No. 2015-2056

NRC Not Applicable – waters of the state not involved

Other (describe):

c. Person(s) reporting release: Andrew Gilpin - Manager Energy and Environment

d. Name, quantity and physical state (gas, liquid, solid or semi-solid) of material(s) released:
Approximately 100 gallons of hydraulic fluid.

Please attach copies of material safety data sheets (MSDS) for released material(s).

e. The release affected: ____Air____ Groundwater _____ Surface Water __X__ Soil _____ Sediment

f. Name and distance to nearest surface water body(s), even if unaffected (include locations of creeks, streams, rivers and ditches that discharge to surface water on maps):
The spill occurred approximately 2240 feet East from the Willamette River

Has the release reached the surface water identified above?: ____Yes _X_No

Could the release potentially reach the surface water identified above? ____Yes _X_No

Explain: Facilities storm drain system was not affected. The impacted soils have been removed to the extent possible.

g. Depth to nearest aquifer/groundwater: 5-10 feet

Is nearest aquifer/groundwater potable (drinkable)? ____Yes __X_No

Has the release reached the nearest aquifer/groundwater? ____Yes _X_Unknown

Explain: The released hydraulic fluid was contained and cleaned up. Impacted soils have been removed to the extent possible.

h. Release or potential release to the air occurred? ____Yes __X_No
Explain: ___No atomization occurred during or after the spill incident.__

i. Was there a threat to public safety? ____Yes __X_No
j. Is there potential for future releases? ____Yes _X__No
Explain: _An improperly loaded large steel pipe "hopped" off a roll line conveyance system and fell on an adjacent hydraulic system and caused a release of hydraulic fluid. Steel tubing guard surrounding the hydraulic system has been installed to prevent a similar occurrence.
k. Describe other effects/impacts from release (emergency evacuation, fish kills, etc.):
___None_

l. Describe how the release occurred. Include details such as the release source, cause, contributing weather factors, activities occurring prior to or during the release, dates and times of various activities, first responders involved in containment activities, etc.:

On 9/7/2015, at approximately 11:20 PM an improperly loaded pipe on a roll line conveyer system at the Double Joiner facility, "hopped" off the roll line and fell on a hydraulic system, damaging the hydraulic line. The damaged hydraulic line caused a release of approximately 100 gallons of Blue Star HL 6890/46 lubricant oil to a concrete pad underneath the roll line and aggregate soils on the west side of the concrete pad. Absorbents were initially used to contain the released lubricant oil from the ground surface. Spent absorbent material and affected soils (approximately 2 cubic yards) were removed to the extent possible by outside contractor, Terra Hydr. Initial excavation of the affected area took place on 9/8/2015. Subsequent excavation of the affected area was performed on 9/12/2015 after issuance of an EVRAZ internal excavation permit was completed. The weather was sunny and dry. Excavated soils were covered and stored in an on-site containment area prior to disposal. The hydraulic line that caused the release was replaced on 7/8/2015. Select import granular material was placed in the excavated area and compacted. Affected media was disposed of at the Riverbend Landfill on 10/02/2015.

3 - SITE INFORMATION

a. Adjacent land uses include (check all that apply and depict on site maps):
____Residential ____Commercial ____Light Industrial __X_Heavy Industrial
____Agricultural ____Other (describe):_____
b. What is the population density surrounding the site:_____N/A__
c. Is the site and/or release area secured by fencing or other means? _X_Yes ____No
d. Soil types (check all that apply): __X_alluvial ____ bedrock ____ clay _X__sandy
_X__silt ____ silty loam ____artificial surface (cement/asphalt/etc.)
e. Describe site topography:___Predominantly flat.

4 - CLEANUP INFORMATION

a. Was site cleanup performed? __X_Yes ____No
If No, explain:_____
_____

b. Who performed the site cleanup?
Company Name: __Terra Hydr_____
Address: _____PO Box 3616_____
_____Portland, OR 97208_____
Cleanup Supervisor: _Hank Stukey_____
Phone Number(s): ____503-625-4000_____

c. Has all contamination been removed from the site? _X_Yes ____No
If No, explain:_____
_____

d. Estimated volume of contaminated soil removed: _Approximately 3 cubic yards____

e. Estimated volume of contaminated soil left in place: unknown if any – impacted soils were removed to the extent possible.

f. Was a hazardous waste determination made for cleanup materials? __X_Yes ____No

g. Based on the determination, are the cleanup materials hazardous wastes?
____Yes __X_No If Yes, list all waste codes:_____

h. Was contaminated soil or water disposed of at an off-site location? __X_Yes ____No
If yes, attach copies of receipts/manifests/etc., and provide the following information:
Facility Name: ____Riverbend Landfill__
Address: _____13469 SW Highway 18 _____
_____McMinnville, Oregon 97128-8634__
Facility Contact: ____Mark Krening_____
Phone Number(s): ____(503) 519-3959_____

i. Is contaminated soil or water being stored and/or treated on-site? ____Yes _X__No
If yes, please describe the material(s), storage and/or treatment area, and methods utilized (attach additional sheets if necessary):
_____
_____

j. Describe cleanup activities including what actions were taken, dates and times actions were initiated and completed, volumes of contaminated materials that were removed, etc. (attach additional sheets or contractor reports if necessary or more convenient):
___See contractor (Terra Hydr) spill clean-up report attached. Spill was immediately contained with absorbents. Affected soils were excavated immediately after the release occurred on September 8th, 2015 to a depth of 6 inches with subsequent excavation performed on September 12th, 2015. Approximately 3 cubic yards of excavated soils were stockpiled and covered prior to disposal October 2, 2015.

5 - SAMPLING INFORMATION

Attach copies of all sample data and indicate locations of sample collection on maps.

a. Were samples of contaminated soil collected? _X_ Yes ____No ____N/A
b. Were samples of contaminated water collected? ____Yes ____No _X__N/A
c. Were samples collected to show that all contamination had been removed? _X__Yes ____No ___N/A
d. Describe sampling activities, results and discuss rationale for sampling methods:

A two grab samples was collected from the excavated area where the spill occurred. The two grab samples were composited into a single composite sample for analysis of NWTPH-DX by Specialty Analytical. See attached laboratory analysis report.

6 - SPILL REPORT CHECKLIST

To ensure that you have gathered all the information requested by the Department in this Spill/Release Report, please complete the following checklist:

_X___Map(s), pre and post cleanup photos of the of the site showing buildings, roads, surface water bodies, ditches, waterways, point of the release, extent of contamination, areas of excavation and sample collection locations attached.

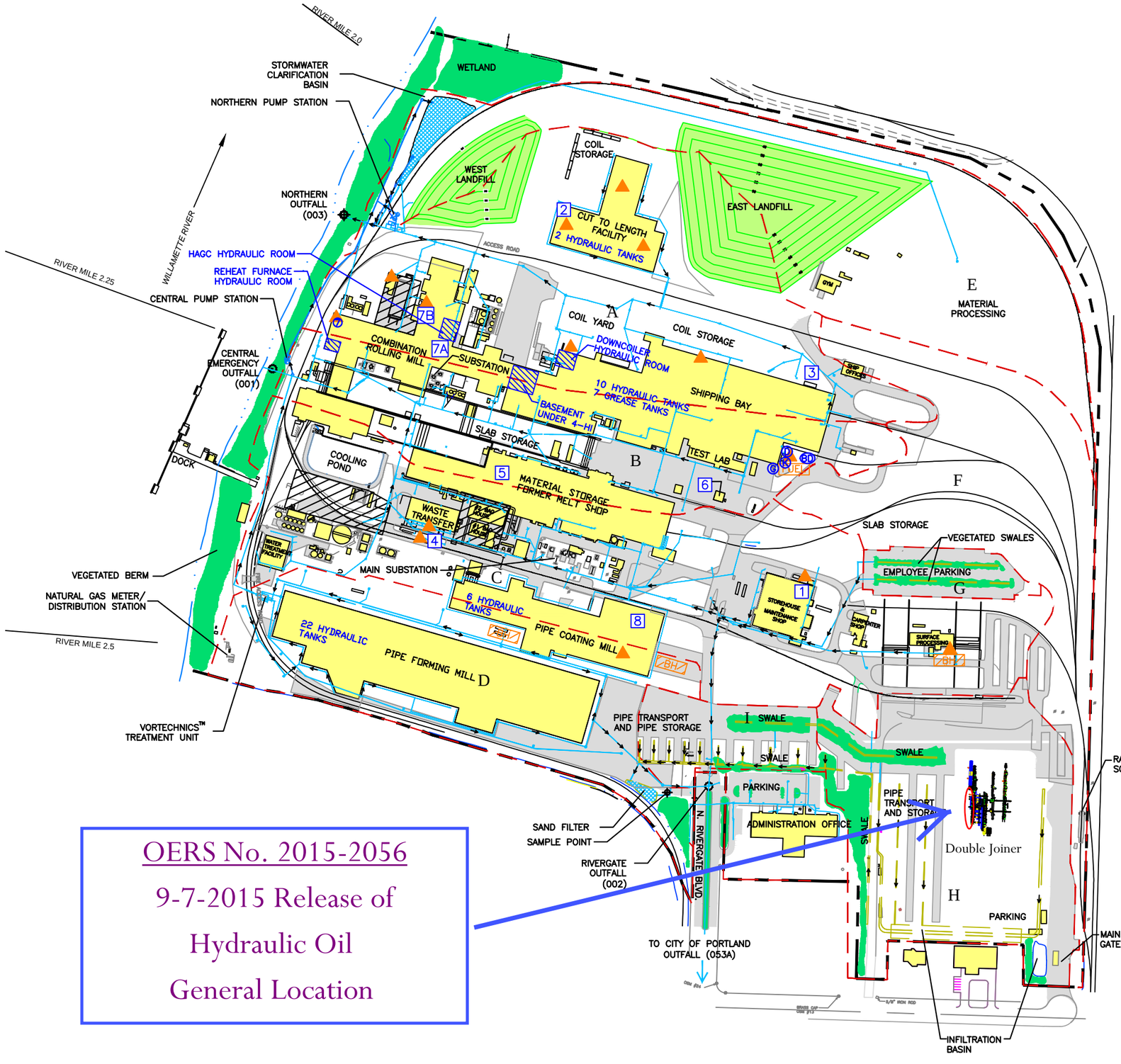
_X__ Material Safety Data Sheet (MSDS) for released material(s) attached. **Note: an MSDS is not required for motor fuels.**

_X__ Sampling data/analytical results attached.

_X__ Receipts/manifests (if any) for disposal of cleanup materials attached.

_X__ Contractor reports (if any) attached.

If you would like to submit your report by e-mail it can be submitted electronically to: DOSPILLS@deq.state.or.us



OERS No. 2015-2056
9-7-2015 Release of
Hydraulic Oil
General Location

N

175 0 350
1"=350'

LEGEND

- Ⓓ ABOVEGROUND STORAGE TANK – FUEL (SEE NOTE)
- 1 CONTAINER STORAGE AREA
- HYDRAULIC ROOM
- BH BAG HOUSE
- SPILL KIT
- A DRAINAGE BASIN
- STORM DRAIN SYSTEM
- SWALE
- DRAINAGE FLOW DIRECTION
- BUILDING/STRUCTURE
- PAVEMENT/CONCRETE
- AREA DRAINS TO COOLING POND
- VEGETATION
- LANDFILL GRASS COVER
- MEAN HIGH WATER LEVEL 9.6ft NGVD
- RAILROAD

NOTE: BD – BIODIESEL, D – DIESEL,
G – GASOLINE, K – KEROSENE

DRAINAGE BASIN SURFACE AREAS (ACRES)

DRAINAGE BASIN	TOTAL AREA	BUILDINGS	PAVEMENT	TOTAL IMPERVIOUS	TOTAL PERVIOUS	DRAINS TO
A	24.7	6.5	1.8	8.3	16.4	003
B	13.6	6.3	1.8	8.1	5.5	003
C	27.3	6.6	8.3	14.9	12.4	003
D*	15.3	6.7	1.68	8.38	6.92	4.4 acres to 002; 10.9 to 003
E	20.3	0.1	0	0.1	20.2	003
F	14.1	0	0.4	0.4	13.7	infiltrates
G	1.8	0	1.06	1.06	0.74	002
H	14.6	0.06	6.11	6.17	8.43	infiltrates
I	3.2	0	2.15	2.2	1.0	002
TOTAL	135	26	23	50	85	

* SPIRAL PIPE MILL BUILDING AREA = 240,300 ft² (5.5 acres). 20% OF SPIRAL PIPE MILL ROOF RUNOFF DISCHARGES TO NORTHERN OUTFALL 003 AND 80% DISCHARGES TO RIVERGATE OUTFALL 002.

SURFACE AREA (ACRES) DRAINING T O EACH OUTFALL

SURFACE	OUTFALL: CENTRAL EMERGENCY 001	OUTFALL: RIVERGATE 002	OUTFALL: NORTHERN 003	TOTAL
PERVIOUS	0	1.2	63.2	64
IMPERVIOUS	0	8.2	33.6	42
TOTAL	0	9	97	106

NOTE: BASINS F AND H (28.7 ACRES) DO NOT DRAIN TO OUTFALLS
1) RIVERGATE 002 INCLUDES BASINS G,I AND 80% OF PIPE MILL ROOF RUNOFF.
2) NORTHERN 003 INCLUDES BASINS A,B,C,D, AND E, EXCLUDING 80% OF PIPE MILL ROOF RUNOFF.

EVRAZ PORTLAND - RIVERGATE

14400 N Rivergate Blvd
Portland, OR 97203

DATE: 5/9/2013 | DRWN: BTS | **FIGURE 2**

EVRAZ Portland - Double Joiner

OERS 2015-2056 - hydraulic oil spill - September 7, 2015

Hydraulic oil spill along roll line - photo taken after initial excavation.

EVRAZ - Portland Double Joiner

OERS 2015-2056 - hydraulic oil spill September 7, 2015

photos of impacted soils along roll line just after initial excavatio

EVRAZ Portland - Double Joiner - Post clean-up

OERS 2015-2056 - hydraulic oil spill - Sept. 7, 2015

Post Clean-up photos taken October 5, 2015

Material Safety Data Sheet

Section 1 Product and Company Identification

Manufacturer
Blue Star Lubrication Technology®, LLC
915 N. Plum Grove Road, Suite C
Schaumburg, IL 60173
United States of America
Phone: 847-285-1888 Fax: 847-285-1894

Emergency Phone Numbers
847-285-1888 Normal Business Hrs.
USA & Canada Chemtrec 800-424-9300
International Chemtrec 703-527-3887

Recommended Usage: Formulated Industrial Lubricant
Other Identifier: Mixture

Product Name: Blue Star® HL 6890/46

Section 2 Hazards Identification

Classification of the Mixture: Light yellow to amber liquid. Mild ester odor.
Most Important Hazards: This material is considered moderately hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200). May cause respiratory tract, skin and eye irritation. May cause skin sensitization with susceptible individuals. May be harmful if swallowed.
Hazard Classification:
Causes eye and skin irritation – Category 2
May cause allergic skin reaction – Category 1
Signal Word: Warning!
Pictograms:

Precautionary Statements:
Inhalation - Avoid breathing dust/fume/gas/mist/vapors/spray. Keep container tightly closed. Use only with adequate ventilation.
Skin – Avoid contact with skin and clothing. Wash thoroughly after handling.
Eyes - Avoid contact with eyes. Wash thoroughly after handling.
Ingestion – May be fatal if swallowed and enters airways.
Quantity of Ingredients with Unknown Acute Toxicity: 0.0%

Section 3 Composition Information on Ingredients

Ingredient	WT %	CAS #
2-t-butylhydroquinone	< 1	1948-33-0

BLUE STAR
Lubrication Technology

Section 4 First Aid Measures

Eyes: Flush eyes with running water for at least 15 minutes. If redness, burning, blurred vision or irritation persists, transport to nearest medical facility for additional treatment.
Skin: Flush skin with water, wash with soap and water. If irritation occurs, get medical attention. Remove contaminated clothing and wash before reuse. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.
Ingestion: Do NOT induce vomiting and obtain medical attention. Have victim rinse mouth out with water. If vomiting occurs spontaneously, keep head below hips to prevent aspiration.
Inhalation: Remove victim to fresh air and keep at rest in a position comfortable for breathing. If the victim has difficulty breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Section 5 Fire Fighting Measures

Flammable Properties:
Flash point: > 210°C (ASTM D56) Flammable limits in air: N/E Auto ignition temperature: N/E
Extinguishing media: CO_2, dry chemical, foam
Special firefighting measure:
The material as received will not support combustion, however its residues may; therefore, procedures for an oil fire should be followed. Use self-contained breathing apparatus. Use foam or dry chemical to extinguish fire. Water may be used only to keep surrounding containers cool. Firefighters should wear proper protective equipment and self-contained breathing apparatus with full face piece operated in positive pressure mode.

Section 6 Accidental Release Measures

- **Eliminate ignition sources and ventilate area.**
- **Absorb spillage with inert absorbent material.**
- **Contain spill and keep from entering waterways or sewers.**
- **Advise EPA/state agency if required.**
- **Use proper personal protective equipment for clean-up.**
- **Treat contaminated absorbent same as spilled product.**

Section 7 Handling and Storage

Handling and Storage Precautions: Avoid heat, open flames, including pilot lights, and strong oxidizing agents. Use explosion-proof ventilation to prevent vapor accumulation. Ground all handling equipment to prevent sparking. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Have appropriate fire extinguishers and spill clean-up equipment in or near storage area.
Work/Hygienic Practices: Wash with soap and water before eating, drinking, smoking, applying cosmetics, or using toilet. Launder contaminated clothing before reuse. Properly dispose of contaminated leather articles such as shoes or belts that cannot be decontaminated. Contaminated leather articles including shoes cannot be decontaminated and should be destroyed to prevent reuse.

Section 8 Personal Protection/ Exposure Controls

Engineering Controls: Use adequate ventilation to keep vapors and mists of this material below applicable standards. Recommended work place control parameters - based on oil mists OSHA TWA 5 mg/m^3.
Respiratory Protection: If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, an approved respirator must be worn. Respirator selection, use and maintenance should be in accordance with the requirements of the OSHA Respiratory Protection Standard, 29 CFR 1910.134.
Skin Protection: Use protective clothing that is chemically resistant to this product. Acceptable materials for gloves and aprons are: neoprene, nitrile rubber or viton.
Eye Protection: Use safety glasses or goggles. Have suitable eye wash water available.
Other/General Protection: For mists and vapors: Air Purifying, organic vapor cartridge, NIOSH approved respirator. Use self-contained breathing apparatus for environments with unknown concentrations or emergency situations.

BLUE STAR
Lubrication Technology

Section 9 Physical and Chemical Properties

Color:	Amber to light yellow	**Vapor Pressure:**	N/E	**Solubility in Water:**	Negligible
Appearance:	Clear Liquid	**% Volatile by Volume:**	N/E	**Evaporation Rate**	
Odor:	Mild ester odor	**Vapor Density (air = 1):**	N/E	**(butyl acetate = 1):**	N/E
Boiling Point:	> 235° C	**Reactivity in Water:**	Non-reactive	**Specific Gravity:**	0.865 – 0.885

Section 10 Stability and Reactivity

Stability: Stable **Conditions to avoid:** Sources of ignition. **Incompatibility:** Strong oxidizing or reducing agents.
Decomposition Products: Oxides of Carbon and Hydrogen. **Hazardous Polymerization:** Will not occur.

Section 11 Toxicological Information

Likely Routes of Exposure: Inhalation, skin, eyes and ingestion.
Potential Health Effects:
Eye Effects: May cause eye irritation.
Skin Effects: May cause slight skin irritation. Based upon data from similar materials, prolonged or repeated skin contact as from clothing wet with material may cause dermatitis. Symptoms may include redness, edema, drying, and cracking of the skin.
Oral Effects: Harmful if swallowed, may cause gastrointestinal tract irritation, nausea and vomiting if mixture is swallowed.
Inhalation Effects: Harmful if inhaled. May cause respiratory tract irritation.
Chronic Health Effects: Repeated skin contact may cause dermatitis or skin acne. Excessive inhalation of oil mist may cause accumulation of mineral oil in lungs accompanied by pulmonary fibrosis.
Mutagenicity: Negative
Carcinogenicity: This mixture contains mineral oils which are considered to be severely refined and not considered to be carcinogenic under IARC. All the oils in this mixture have been demonstrated to contain less than 3% extractable's by the IP 346 test.
Reproductive Effects: Negative
Teratogenicity: Negative
Sensitization: Potential Skin Sensitizer Category 1. 2-t-butylhydroquinone may cause allergic skin reaction.
Toxicological Data:

ATE oral is > 2,000 mg/kg
ATE dermal is >2,000 mg/kg
ATE inhalation (aerosol) is estimated at 5.2 mg/L/4 hour

Section 12 Ecological Information

Not classified due to inadequate data available on this mixture. Recommend avoidance of release to the environment.

Section 13 Disposal Considerations

Avoid release to the environment. Dispose in a safe manner in accordance with national, state and local regulations. Not a RCRA hazardous waste if uncontaminated. If “used” RCRA criteria must be determined. Dispose of container by recycling or if permitted incineration.

Section 14 Transportation Information

Proper Shipping Name: Lubricating Oils. N.O.S.
Shipping Class: 65
Dot Identification Number: Not applicable
Dot Shipping Label: Not regulated by DOT.
TDG Classification: Not controlled under TDG (Canada).

BLUE STAR
Lubrication Technology

Section 15 Regulatory Information

U.S. Federal Regulatory Information:
SARA 302 Threshold Planning Quantity: N/A SARA 304 Reportable Quantity: N/A
SARA 311 Categories:

Acute Health Effects:	Yes
Chronic Health Effects:	No
Fire Hazard:	No
Sudden Release of Pressure Hazard:	No
Reactivity Hazard:	No

EPA/TSCA Inventory: The components of this product are listed on the EPA/TSCA inventory of chemicals.
EPA Hazard Classification Code: Not applicable
CERCLA: No chemicals in this product are subject to the reporting requirements of CERCLA.
SARA Title III - Section 313 Supplier Notification: No Chemicals in this product exceed the DE Minimus reporting level established by SARA Title III, Section 313 and 40 CFR 372.
WHMIS Classification: WHMIS controlled. Class D; Division 2, Subdivision B: otherwise causing toxic effects.
Other Regulations: All components of this formulation are listed on the CEPA-DSL (Domestic Substance List)

Section 16 Other Information

NFPA Hazard Rating:

Health:	**1**	**Slight**
Flammability:	**1**	**Negligible**
Reactivity:	**0**	**Negligible**

SDS Dated: 6/22/2015
***Threshold Limit Value/Personal Exposure Limit
N/A = Not Applicable
N/E = Not Established

Disclaimer of Express or Implied Warranties
The information contained herein is based upon data believed to be reliable and reflects our best professional judgment. Although reasonable care has been taken in the preparation of this document, we extend no warranties and make no representations as to the accuracy of completeness of the information contained therein and assume no responsibility regarding the suitability of this information for the user's intended purpose or for the consequence of its use. Each individual should make a determination as to the suitability of the information for his/her particular purpose(s).

Specialty Analytical

11711 SE Capps Road, Ste B
Clackamas, Oregon 97015
TEL: 503-607-1331 FAX: 503-607-1336
Website: www.specialtyanalytical.com

September 28, 2015

Debbie Deetz Silva
EVRAZ
14400 N Rivergate Blvd
Portland, OR 97203

TEL: (503) 978-6044
FAX: (503) 978-4922

RE: Soil Confirmation Sample/OEM 2015-2056

Dear Debbie Deetz Silva: Order No.: 1509114

Specialty Analytical received 1 sample(s) on 9/15/2015 for the analyses presented in the following report.

There were no problems with the analysis and all data for associated QC met EPA or laboratory specifications, except where noted in the Case Narrative, or as qualified with flags. Results apply only to the samples analyzed. Without approval of the laboratory, the reproduction of this report is only permitted in its entirety.

If you have any questions regarding these tests, please feel free to call.

Sincerely,

Marty French
Lab Director

Specialty Analytical

Date Reported: 28-Sep-15

CLIENT: EVRAZ
Project: Soil Confirmation Sample/OEM 2015-2056

Lab Order: 1509114

Lab ID: 1509114-001
Collection Date: 9/12/2015 11:30:00 AM
Client Sample ID: EVRAZ-OEM 2015-2056
Matrix: SOIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
NWTPH-DX		**NWTPH-DX**				Analyst: **BS**
Diesel	39.9	16.8	A1	mg/Kg-dry	1	9/25/2015 10:47:08 PM
Lube Oil	140	56.1	A2	mg/Kg-dry	1	9/25/2015 10:47:08 PM
Surr: o-Terphenyl	88.7	50-150		%REC	1	9/25/2015 10:47:08 PM

QC SUMMARY REPORT

WO#: **1509114**

Specialty Analytical

29-Sep-15

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2056 **TestCode:** **NWTPHDX_S**

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**
Client ID: **CCV** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295691**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1040	15.0	999.0	0	104	85	115				
Lube Oil	430	50.0	499.5	0	86.1	85	115				

Sample ID: **MB-10076** SampType: **MBLK** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **PBS** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295692**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.0									
Lube Oil	ND	50.0									
Surr: o-Terphenyl	35.4		33.30		106	50	150				

Sample ID: **LCS-10076** SampType: **LCS** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **LCSS** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295693**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	170	15.0	166.5	0	102	76.3	125				
Lube Oil	173	50.0	166.5	0	104	69.9	127				

Sample ID: **1509160-001ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295695**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Qualifiers:
B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1509114**

Specialty Analytical

29-Sep-15

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2056 **TestCode:** **NWTPHDX_S**

Sample ID: **1509160-001ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**

Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295695**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.8						0	0	20	RF
Lube Oil	ND	52.7						0	0	20	RF

Sample ID: **1509161-013ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**

Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295731**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	16.6						0	0	20	R
Lube Oil	ND	55.2						0	0	20	

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCV** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295732**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1300	15.0	1332	0	97.4	85	115				
Lube Oil	571	50.0	666.0	0	85.7	85	115				

Sample ID: **CCB** SampType: **CCB** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCB** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295733**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.0									

Qualifiers:

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

O RSD is greater than RSDlimit

R RPD outside accepted recovery limits

S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1509114**

29-Sep-15

Specialty Analytical

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2056 **TestCode:** **NWTPHDX_S**

Sample ID: **CCB** SampType: **CCB** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCB** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295733**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lube Oil	ND	50.0									
Surr: o-Terphenyl	34.6		33.30		104	50	150				

Qualifiers:

B	Analyte detected in the associated Method Blank	H	Holding times for preparation or analysis exceeded	ND	Not Detected at the Reporting Limit
O	RSD is greater than RSDlimit	R	RPD outside accepted recovery limits	S	Spike Recovery outside accepted reco

KEY TO FLAGS

Rev. May 12, 2010

A	This sample contains a Gasoline Range Organic not identified as a specific hydrocarbon product. The result was quantified against gasoline calibration standards
A1	This sample contains a Diesel Range Organic not identified as a specific hydrocarbon product. The result was quantified against diesel calibration standards.
A2	This sample contains a Lube Oil Range Organic not identified as a specific hydrocarbon product. The result was quantified against a lube oil calibration standard.
A3	The result was determined to be Non-Detect based on hydrocarbon pattern recognition. The product was carry-over from another hydrocarbon type.
A4	The product appears to be aged or degraded diesel.
B	The blank exhibited a positive result great than the reporting limit for this compound.
CN	See Case Narrative.
D	Result is based from a dilution.
E	Result exceeds the calibration range for this compound. The result should be considered as estimate.
F	The positive result for this hydrocarbon is due to single component contamination. The product does not match any hydrocarbon in the fuels library.
G	Result may be biased high due to biogenic interferences. Clean up is recommended.
H	Sample was analyzed outside recommended holding time.
HT	At clients request, samples was analyzed outside of recommended holding time.
J	The result for this analyte is between the MDL and the PQL and should be considered as estimated concentration.
K	Diesel result is biased high due to amount of Oil contained in the sample.
L	Diesel result is biased high due to amount of Gasoline contained in the sample.
M	Oil result is biased high due to amount of Diesel contained in the sample.
MC	Sample concentration is greater than 4x the spiked value, the spiked value is considered insignificant.
MI	Result is outside control limits due to matrix interference.
MSA	Value determined by Method of Standard Addition.
O	Laboratory Control Standard (LCS) exceeded laboratory control limits, but meets CCV criteria. Data meets EPA requirements.
Q	Detection levels elevated due to sample matrix.
R	RPD control limits were exceeded.
RF	Duplicate failed due to result being at or near the method-reporting limit.
RP	Matrix spike values exceed established QC limits; post digestion spike is in control.
S	Recovery is outside control limits.
SC	Closing CCV or LCS exceeded high recovery control limits, but associated samples are non-detect. Data meets EPA requirements.
*	The result for this parameter was greater that the maximum contaminant level of the TCLP regulatory limit.

CHAIN OF CUSTODY RECORD

Specialty Analytical
11711 SE Capps Road
Clackamas, OR 97015
Phone: 503-607-1331
Fax: 503-607-1336

Contact Person/Project Manager: Debbie Deetz Silva
Company: Evraz Inc. NA
Address: 14400 N. Rivergate Blvd. Portland, OR 97203
Phone: 503-978-6044 Fax: 506-978-6042
Project No.: OEM 2015-2056 Project Name: Soil confirmation sample
Project Site Location OR: XXX WA: Other:
Invoice To: Accounts Payable - EVRAZ above address P.O. No.: 148521

Collected By:
Signature: Terra Hydr
Printed: Terra Hydr
Signature: Debbie Deetz Silva
Printed: Debbie Deetz Silva

Turn Around Time
☑ Normal 5-7 Business Days
☐ Rush _____
Specify
Rush Analyses Must Be Scheduled With The Lab In Advance

For Laboratory Use
Lab Job No.: 150911-4
Shipped Via:
Air Bill No.:
Temperature On Receipt: AMB C
Specialty Analytical Containers? ☐/☐
Specialty Analytical Trip Blanks? ☐/☐

Date	Time	Sample I.D.	Matrix	No. of Containers	Analyses: NORTHWEST TPH-DX	Comments	Lab I.D.
9/12/15	11:30	EVRAZ - OEM 2015-2056	soil	2	X	please composite the two (2) containers for one (1) sample analysis	

Relinquished By:	Date	Time	Received By:	Relinquished By:	Date	Time
Company: EVRAZ Bobbi Stout	9/15/15	12:13pm	Company:	Company:	9-15-15	13:50

Unless Reclaimed, Samples Will Be Disposed of 60 Days After Receipt.
Samples held beyond 60 days subject to storage fee(s)

Received For Lab By: Date: 9.15.15 Time: 13:50

Copies: White-Original Yellow-Project File Pink-Customer Copy

Riverbend Landfill
13469 SW HIGHWAY 18,
MCMINNVILLE, OR, 97128-8634
Ph: (503) 472-8788

Reprint Ticket # 1029261

Customer Name	EVRAZ OREGON STEEL	Carrier	CELORIE CELORIE BROTHERS
Ticket Date	10/02/2015	Vehicle#	23 Volume
Payment Type	Credit Account	Container	
Manual Ticket#		Driver	
Hauling Ticket#		Check#	
Route		Billing#	0001071
StateWasteCode		Gen EPA ID	
Manifest	NA	Grid	
Destination			
PO#	152857		
Profile	119035OR(Fuel Oil Impacted Soil/Debris)		
Generator	1756536 OR-EVRAZ OREGON STEEL		

	Time	Scale	Operator	Inbound			
					Gross	103120	lb
In	10/02/15 09:50:32 AM	Inbound	carolj		Tare	39240	lb
Out	10/02/15 10:05:29 AM	Outbound	CAROLJ		Net	63880	lb
					Tons	31.94	

Comments

Products	LD%	Qty	UOM	Rate	Fee	Amount	Origin
Cont Soil Pet-RGC-Tons-Cont. Soil	100	31.94	Tons	[redacted]		[redacted]	MULT-IN ME
TRKF-Trucking Fee	100	31.94	Tons	[redacted]		[redacted]	MULT-IN ME

Total Fees

Driver's Signature _____

Total Ticket [redacted]

TERRA HYDR INC.

October 04, 2015

Ms. Debbie Deetz-Silva
EVRAZ Oregon Steel Mills
14400 N Rivergate Blvd.
Portland OR 97203

RE: Spill Response at Pipe Jointer (OERS #2015-2056)

Late on Monday September 7th, Terra Hydr Inc. (THI) responded to a hydraulic oil release at the pipe jointer roll line. We were informed that a pipe had slipped off of the line, striking a hydraulic valve, releasing approximately 100 gallons of oil. Initial cleanup was completed at approximately 0600 on Tuesday morning.

THI mobilized a Guzzler NX dry vacuum truck and DW-30 wet vacuum trailer to evac residual oil and contaminated rock media. Affected area was approximately 1.5' wide by 30' long. Excavation was limited to 6" BGS pending utility locates and issuance of an Evraz excavation permit. Approximately two cubic yards (2 CY) of PCS was transported to the on-site storage area for disposal by others.

THI remobilized dry vacuum truck on Saturday the 12th, after issuance of excavation permit, to complete excavation of an additional approximate one cubic yard (1CY) of material. This material was also placed in the on-site storage area and covered with plastic. Composite confirmation sample was taken from two locations and delivered to Evraz for analytical processing by others.

Site restoration was completed by supplying and placing approximately five tons (5 TN) of select import granular rock material, with compaction.

We appreciate the opportunity to be of service to Evraz on this project. Please contact us at your earliest convenience, should you require additional information.

Sincerely,

Henry J Stukey

SPILL/RELEASE REPORT

State of Oregon Department of Environmental Quality

1 - GENERAL INFORMATION **OERS No.** 2015-2126

a. Company/Individual Name: EVRAZ

b. Address: 14400 N. Rivergate Blvd
Portland, OR 97203

c. Company Contact Person: Debbie Deetz Silva

d. Phone Number(s): 503-978-6044

e. Specific on-site location of the release (and address if different from above):
Southeast corner of service water system cooling pond area at the road crossing.

Please provide a map of the site showing area(s) where the release occurred, any sample collection locations, location of roads/ditches/surface water bodies, etc.

2 - RELEASE INFORMATION

a. Date/Time Release started: 9-16-2015 ~7:30 PM Date/Time stopped: 9-16-2015 ~ 7:35 PM

b. Release was reported to (specify Date/Time/Name of Person contacted where applicable):

ODEQ 9-16-15 ~ 10:40 PM with DEQ follow-up – Julie Burton

OERS 9-16-2015 ~ 10:00 PM – Keelyn - OERS No. 2015-2126

NRC Not Applicable – waters of the state not involved

Other (describe):

c. Person(s) reporting release: Debbie Deetz Silva

d. Name, quantity and physical state (gas, liquid, solid or semi-solid) of material(s) released:
Approximately 75-80 gallons of hydraulic oil.

Please attach copies of material safety data sheets (MSDS) for released material(s).

e. The release affected: ___Air ___Groundwater ___Surface Water _X_ Soil ___ Sediment

f. Name and distance to nearest surface water body(s), even if unaffected (include locations of creeks, streams, rivers and ditches that discharge to surface water on maps):
The spill occurred approximately 350 feet East from the Willamette River

Has the release reached the surface water identified above?: ____Yes _X_No

Could the release potentially reach the surface water identified above? ____Yes _X_No

Explain: Facilities' storm drain system was checked, protected and found not to be impacted by this release. Near-by storm catch basin was cleaned as a precaution. The impacted soils have been removed to the extent possible.

g. Depth to nearest aquifer/groundwater: 5-10 feet

Is nearest aquifer/groundwater potable (drinkable)? ____Yes __X_No

Has the release reached the nearest aquifer/groundwater? ____Yes _X_Unknown

Explain: The released hydraulic fluid was contained and cleaned up. Impacted soils have been removed to the extent possible.

h. Release or potential release to the air occurred? ____Yes __X_No

Explain:___No atomization occurred during or after the spill incident.__

i. Was there a threat to public safety? ____Yes __X_No
j. Is there potential for future releases? ____Yes _X__No

Explain: The cap on a tote of hydraulic oil popped off when the forklift transporting the tote hit a pot hole and slid off the forks carrying it. The road surface has been restored and employee spill prevention training has occurred. _____

k. Describe other effects/impacts from release (emergency evacuation, fish kills, etc.):

____None_

l. Describe how the release occurred. Include details such as the release source, cause, contributing weather factors, activities occurring prior to or during the release, dates and times of various activities, first responders involved in containment activities, etc.:

On 9/16/2015 at approximately 7:30PM an employee was using a forklift to transport a tote of 6810/46 hydraulic oil. The forklift encountered a pot hole in the road which caused the tote to slide off the forks and tip over. The cap on the tote popped off and a release of approximately 75-80 gallons of oil to highly compacted soils occurred. A nearby storm drain catch basin was protected with a spill mat and oil absorbent socks. Oil absorbent materials (clay and pads) were initially used to contain the released oil from the soil surfaces. Spent absorbent material and affected soils (approximately 5 cubic yards) were excavated to the extent possible by outside contractor, Terra Hydr at approximately 10:30 PM on 9/16/2015. No release of oil to the storm drain system occurred, however the catch basin was cleaned out as a precaution. The weather at the time of the spill was dry however slight sprinkle occurred later in the evening during excavation. Excavated soil media was temporarily covered and stored at a designated on-site containment area prior to disposal. A Two point composite confirmation sample of the excavated area was taken on 9-17-2015 after the visibly impacted soils were excavated to the extent possible. The excavated area was restored using granular rock on 9-18-2015. Affected media was disposed of at the Riverbend Landfill on 10/2/2015.

3 - SITE INFORMATION

a. Adjacent land uses include (check all that apply and depict on site maps):
____Residential ____Commercial ____Light Industrial __X_Heavy Industrial
____Agricultural ____Other (describe):_____
b. What is the population density surrounding the site:_____N/A_____
c. Is the site and/or release area secured by fencing or other means? _X_Yes ____No
d. Soil types (check all that apply): __X_alluvial ____ bedrock ____ clay _X__sandy
_X__silt ____ silty loam ____artificial surface (cement/asphalt/etc.)
e. Describe site topography:___Predominantly flat._____

4 - CLEANUP INFORMATION

a. Was site cleanup performed? __X_ Yes ____No
If No, explain:_____
_____

b. Who performed the site cleanup?
Company Name: __Terra Hydr_____
Address: _____PO Box 3616_____
_____Portland, OR 97208_____
Cleanup Supervisor: _Hank Stukey_____
Phone Number(s): ____503-625-4000_____

c. Has all contamination been removed from the site? _X_ Yes ____No
If No, explain:_____
_____

d. Estimated volume of contaminated soil removed: _Approximately 5 cubic yards_____

e. Estimated volume of contaminated soil left in place: unknown if any – impacted soils were removed to the extent possible.

f. Was a hazardous waste determination made for cleanup materials? __X_ Yes ____No

g. Based on the determination, are the cleanup materials hazardous wastes?
____Yes __X_ No If Yes, list all waste codes:_____

h. Was contaminated soil or water disposed of at an off-site location? __X_ Yes ____No
If yes, attach copies of receipts/manifests/etc., and provide the following information:
Facility Name: ____Riverbend Landfill__
Address: _____13469 SW Highway 18____
_____McMinnville, Oregon 97128-8634__
Facility Contact: ____Mark Krening_____
Phone Number(s): ____(503) 519-3959_____

i. Is contaminated soil or water being stored and/or treated on-site? ____Yes _X__No
If yes, please describe the material(s), storage and/or treatment area, and methods utilized (attach additional sheets if necessary):
_____
_____

j. Describe cleanup activities including what actions were taken, dates and times actions were initiated and completed, volumes of contaminated materials that were removed, etc. (attach additional sheets or contractor reports if necessary or more convenient):
_See contractor (Terra Hydr) spill clean-up report attached. Spill was immediately contained with absorbents. The nearby storm drain catch basin was protected using a drain mat and sock absorbents however, there was no oil released to the storm system. Affected soils were excavated to the extent possible on 9/16-17/2015. Approximately 5 cubic yards of excavated soils were stockpiled and covered prior to disposal on October 2, 2015.

5 - SAMPLING INFORMATION
Attach copies of all sample data and indicate locations of sample collection on maps.

a. Were samples of contaminated soil collected? _X_ Yes ____No ____N/A
b. Were samples of contaminated water collected? ____Yes ____No _X__N/A
c. Were samples collected to show that all contamination had been removed? _X__Yes ____No __N/A
d. Describe sampling activities, results and discuss rationale for sampling methods:

A two point grab sample was collected from the excavated area where the spill occurred. The two grab samples were sent to Specialty Analytical and composited into a single sample that was analyzed for NWTPH-DX. See attached sample analytical report.

6 - SPILL REPORT CHECKLIST

To ensure that you have gathered all the information requested by the Department in this Spill/Release Report, please complete the following checklist:

_X___Map(s), pre and post cleanup photos of the of the site showing buildings, roads, surface water bodies, ditches, waterways, point of the release, extent of contamination, areas of excavation and sample collection locations attached.

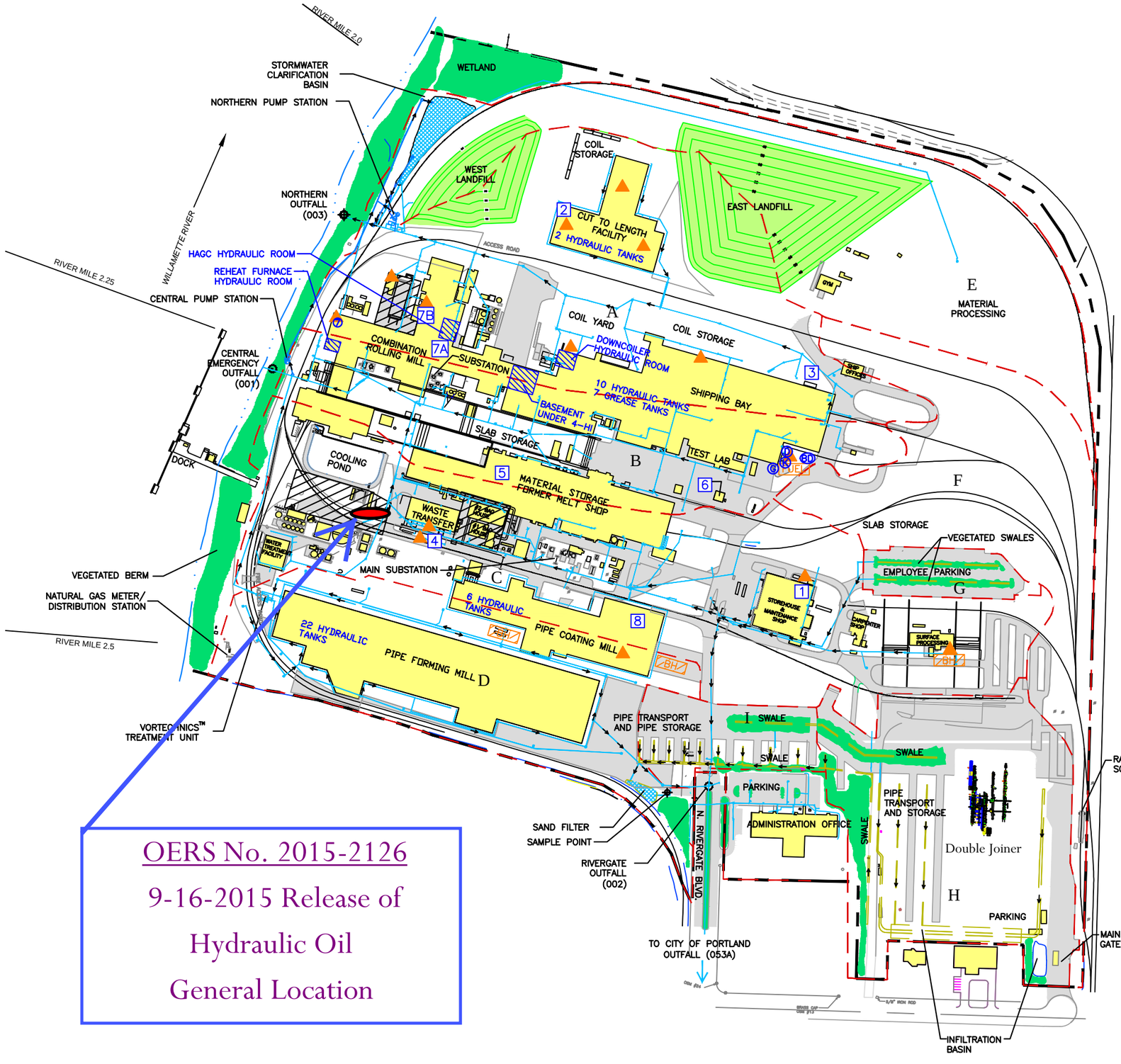
_X__ Material Safety Data Sheet (MSDS) for released material(s) attached. **Note: an MSDS is not required for motor fuels.**

_X__ Sampling data/analytical results attached.

_X__ Receipts/manifests (if any) for disposal of cleanup materials attached.

_X__ Contractor reports (if any) attached.

If you would like to submit your report by e-mail it can be submitted electronically to: DOSPILLS@deq.state.or.us



OERS No. 2015-2126
9-16-2015 Release of
Hydraulic Oil
General Location

N

175 0 350
1"=350'

LEGEND

- ABOVEGROUND STORAGE TANK – FUEL (SEE NOTE)
- 1 CONTAINER STORAGE AREA
- HYDRAULIC ROOM
- BH BAG HOUSE
- SPILL KIT
- A DRAINAGE BASIN
- STORM DRAIN SYSTEM
- SWALE
- DRAINAGE FLOW DIRECTION
- BUILDING/STRUCTURE
- PAVEMENT/CONCRETE
- AREA DRAINS TO COOLING POND
- VEGETATION
- LANDFILL GRASS COVER
- MEAN HIGH WATER LEVEL 9.6ft NGVD
- RAILROAD

NOTE: BD – BIODIESEL, D – DIESEL,
G – GASOLINE, K – KEROSENE

DRAINAGE BASIN SURFACE AREAS (ACRES)

DRAINAGE BASIN	TOTAL AREA	BUILDINGS	PAVEMENT	TOTAL IMPERVIOUS	TOTAL PERVIOUS	DRAINS TO
A	24.7	6.5	1.8	8.3	16.4	003
B	13.6	6.3	1.8	8.1	5.5	003
C	27.3	6.6	8.3	14.9	12.4	003
D*	15.3	6.7	1.68	8.38	6.92	4.4 acres to 002; 10.9 to 003
E	20.3	0.1	0	0.1	20.2	003
F	14.1	0	0.4	0.4	13.7	infiltrates
G	1.8	0	1.06	1.06	0.74	002
H	14.6	0.06	6.11	6.17	8.43	infiltrates
I	3.2	0	2.15	2.2	1.0	002
TOTAL	135	26	23	50	85	

* SPIRAL PIPE MILL BUILDING AREA = 240,300 ft² (5.5 acres). 20% OF SPIRAL PIPE MILL ROOF RUNOFF DISCHARGES TO NORTHERN OUTFALL 003 AND 80% DISCHARGES TO RIVERGATE OUTFALL 002.

SURFACE AREA (ACRES) DRAINING T O EACH OUTFALL

SURFACE	OUTFALL: CENTRAL EMERGENCY 001	OUTFALL: RIVERGATE 002	OUTFALL: NORTHERN 003	TOTAL
PERVIOUS	0	1.2	63.2	64
IMPERVIOUS	0	8.2	33.6	42
TOTAL	0	9	97	106

NOTE: BASINS F AND H (28.7 ACRES) DO NOT DRAIN TO OUTFALLS
1) RIVERGATE 002 INCLUDES BASINS G,I AND 80% OF PIPE MILL ROOF RUNOFF.
2) NORTHERN 003 INCLUDES BASINS A,B,C,D, AND E, EXCLUDING 80% OF PIPE MILL ROOF RUNOFF.

EVRAZ PORTLAND - RIVERGATE

14400 N Rivergate Blvd
Portland, OR 97203

DATE: 5/9/2013 | DRWN: BTS | **FIGURE 2**


OERS 2015-21
EVRAZ Oil Sp
9-16-2015, 10:3
Before Excavati

OERS 2015-2126
EVRAZ Oil Spill from Tote
9-17-2015, 8:30AM

QERS 2015-2126
EVRAZ Oil Spill
10-5-2015, 9:00 A
Area Backfilled a

Safety Data Sheet

Section 1 Product and Company Identification

Manufacturer
Blue Star Lubrication Technology®, LLC
915 N. Plum Grove Road, Suite C
Schaumburg, IL 60173
United States of America
Phone: 847-285-1888 Fax: 847-285-1894

Emergency Phone Numbers
847-285-1888 Normal Business Hrs.
USA & Canada Chemtrec 800-424-9300
International Chemtrec 703-527-3887

Recommended Usage: Formulated Industrial Lubricant
Other Identifier: Mixture

Product Name: Blue Star® HL 6810 Series

Section 2 Hazards Identification

Classification of the Mixture: Light yellow to amber liquid. Petroleum odor.
Most Important Hazards: This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200). May cause respiratory tract, skin and eye irritation.
Hazard Classification:
Causes eye and skin irritation – Category 2B
Signal Word: Warning!
Pictograms:

Precautionary Statements:
Inhalation - Avoid breathing dust/fume/gas/mist/vapors/spray. Keep container tightly closed. Use only with adequate ventilation.
Skin – Avoid contact with skin and clothing. Wash thoroughly after handling.
Eyes - Avoid contact with eyes. Wash thoroughly after handling.
Ingestion – May be fatal if swallowed and enters airways.
Quantity of Ingredients with Unknown Acute Toxicity: 1.38%

Section 3 Composition Information on Ingredients

Ingredient	WT %	CAS #
Butylated Phenol	< 0.3	128-39-2
Zinc dialkyldithiophosphate	< 0.5	proprietary

BLUE STAR
Lubrication Technology

Section 4 First Aid Measures

Eyes: Flush eyes with running water for at least 15 minutes. If redness, burning, blurred vision or irritation persists, transport to nearest medical facility for additional treatment.
Skin: Flush skin with water, wash with soap and water. If irritation occurs, get medical attention. Remove contaminated clothing and wash before reuse. If redness, swelling, pain and/or blisters occur, transport to the nearest medical facility for additional treatment.
Ingestion: Do NOT induce vomiting and obtain medical attention. Have victim rinse mouth out with water. If vomiting occurs spontaneously, keep head below hips to prevent aspiration.
Inhalation: Remove victim to fresh air and keep at rest in a position comfortable for breathing. If the victim has difficulty breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Section 5 Fire Fighting Measures

Flammable Properties:
Flash point: > 205°C (ASTM D56) Flammable limits in air: N/E Auto ignition temperature: N/E
Extinguishing media: CO_2, dry chemical, foam
Special firefighting measure:
The material as received will not support combustion, however its residues may; therefore, procedures for an oil fire should be followed. Use self-contained breathing apparatus. Use foam or dry chemical to extinguish fire. Water may be used only to keep surrounding containers cool. Firefighters should wear proper protective equipment and self-contained breathing apparatus with full face piece operated in positive pressure mode.

Section 6 Accidental Release Measures

- **Eliminate ignition sources and ventilate area.**
- **Absorb spillage with inert absorbent material.**
- **Contain spill and keep from entering waterways or sewers.**
- **Advise EPA/state agency if required.**
- **Use proper personal protective equipment for clean-up.**
- **Treat contaminated absorbent same as spilled product.**

Section 7 Handling and Storage

Handling and Storage Precautions: Avoid heat, open flames, including pilot lights, and strong oxidizing agents. Use explosion-proof ventilation to prevent vapor accumulation. Ground all handling equipment to prevent sparking. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Have appropriate fire extinguishers and spill clean-up equipment in or near storage area.
Work/Hygienic Practices: Wash with soap and water before eating, drinking, smoking, applying cosmetics, or using toilet. Launder contaminated clothing before reuse. Properly dispose of contaminated leather articles such as shoes or belts that cannot be decontaminated. Contaminated leather articles including shoes cannot be decontaminated and should be destroyed to prevent reuse.

Section 8 Personal Protection/ Exposure Controls

Engineering Controls: Use adequate ventilation to keep vapors and mists of this material below applicable standards. Recommended work place control parameters - based on oil mists OSHA TWA 5 mg/m^3.
Respiratory Protection: If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, an approved respirator must be worn. Respirator selection, use and maintenance should be in accordance with the requirements of the OSHA Respiratory Protection Standard, 29 CFR 1910.134.
Skin Protection: Use protective clothing that is chemically resistant to this product. Acceptable materials for gloves and aprons are: neoprene, nitrile rubber or viton.
Eye Protection: Use safety glasses or goggles. Have suitable eye wash water available.
Other/General Protection: For mists and vapors: Air Purifying, organic vapor cartridge, NIOSH approved respirator. Use self-contained breathing apparatus for environments with unknown concentrations or emergency situations.

BLUE STAR
Lubrication Technology

Section 9 Physical and Chemical Properties

Color:	Amber to light yellow	**Vapor Pressure:**	N/E	**Solubility in Water:**	Negligible
Appearance:	Clear Liquid	**% Volatile by Volume:**	N/E	**Evaporation Rate**	
Odor:	Petroleum odor	**Vapor Density (air = 1):**	N/E	**(butyl acetate = 1):**	N/E
Boiling Point:	> 230° C	**Reactivity in Water:**	Non-reactive	**Specific Gravity:**	0.865 – 0.885

Section 10 Stability and Reactivity

Stability: Stable **Conditions to avoid:** Sources of ignition. **Incompatibility:** Strong oxidizing or reducing agents.
Decomposition Products: Oxides of Carbon and Hydrogen. **Hazardous Polymerization:** Will not occur.

Section 11 Toxicological Information

Likely Routes of Exposure: Inhalation, skin, eyes and ingestion.
Potential Health Effects:
Eye Effects: Irritant. This mixture can cause irritation and redness.
Skin Effects: Irritant. May cause skin irritation. Based upon data from similar materials, prolonged or repeated skin contact as from clothing wet with material may cause dermatitis. Symptoms may include redness, edema, drying, and cracking of the skin.
Oral Effects: Harmful if swallowed, may cause gastrointestinal tract irritation, nausea and vomiting if mixture is swallowed.
Inhalation Effects: Harmful if inhaled. May cause respiratory tract irritation.
Chronic Health Effects: Repeated skin contact may cause dermatitis or skin acne. Excessive inhalation of oil mist may cause accumulation of mineral oil in lungs accompanied by pulmonary fibrosis.
Mutagenicity: Negative
Carcinogenicity: This mixture contains mineral oils which are considered to be severely refined and not considered to be carcinogenic under IARC. All the oils in this mixture have been demonstrated to contain less than 3% extractable's by the IP 346 test.
Reproductive Effects: Negative
Teratogenicity: Negative
Sensitization: Negative
Toxicological Data:

ATE oral is > 4,800 mg/kg
ATE dermal is 2,000 mg/kg
ATE inhalation (aerosol) is estimated at 2.20mg/L/4 hour

Section 12 Ecological Information

Not classified due to inadequate data available on this mixture. Recommend avoidance of release to the environment.

Section 13 Disposal Considerations

Avoid release to the environment. Dispose in a safe manner in accordance with national, state and local regulations. Not a RCRA hazardous waste if uncontaminated. If “used” RCRA criteria must be determined. Dispose of container by recycling or if permitted incineration.

Section 14 Transportation Information

Proper Shipping Name: Lubricating Oils. N.O.S.
Shipping Class: 65
Dot Identification Number: Not applicable
Dot Shipping Label: Not regulated by DOT.
TDG Classification: Not controlled under TDG (Canada).

Section 15 Regulatory Information

U.S. Federal Regulatory Information:
SARA 302 Threshold Planning Quantity: N/A SARA 304 Reportable Quantity: N/A
SARA 311 Categories:

Acute Health Effects:	Yes
Chronic Health Effects:	No
Fire Hazard:	No
Sudden Release of Pressure Hazard:	No
Reactivity Hazard:	No

EPA/TSCA Inventory: The components of this product are listed on the EPA/TSCA inventory of chemicals.
EPA Hazard Classification Code: Not applicable
CERCLA: No chemicals in this product are subject to the reporting requirements of CERCLA.
SARA Title III - Section 313 Supplier Notification: No Chemicals in this product exceed the DE Minimus reporting level established by SARA Title III, Section 313 and 40 CFR 372.
WHMIS Classification: WHMIS controlled. Class D; Division 2, Subdivision B: otherwise causing toxic effects.
Other Regulations: All components of this formulation are listed on the CEPA-DSL (Domestic Substance List)

Section 16 Other Information

NFPA Hazard Rating:

Health:	**1**	**Slight**
Flammability:	**1**	**Negligible**
Reactivity:	**0**	**Negligible**

SDS Dated: 5/28/2015
*****Threshold Limit Value/Personal Exposure Limit
N/A = Not Applicable
N/E = Not Established

Disclaimer of Express or Implied Warranties
The information contained herein is based upon data believed to be reliable and reflects our best professional judgment. Although reasonable care has been taken in the preparation of this document, we extend no warranties and make no representations as to the accuracy of completeness of the information contained therein and assume no responsibility regarding the suitability of this information for the user's intended purpose or for the consequence of its use. Each individual should make a determination as to the suitability of the information for his/her particular purpose(s).

Specialty Analytical

11711 SE Capps Road, Ste B
Clackamas, Oregon 97015
TEL: 503-607-1331 FAX: 503-607-1336
Website: www.specialtyanalytical.com

September 28, 2015

Debbie Deetz Silva
EVRAZ
14400 N Rivergate Blvd
Portland, OR 97203

TEL: (503) 978-6044
FAX: (503) 978-4922

RE: Soil Confirmation Sample/OEM 2015-2126

Dear Debbie Deetz Silva: Order No.: 1509154

Specialty Analytical received 1 sample(s) on 9/18/2015 for the analyses presented in the following report.

There were no problems with the analysis and all data for associated QC met EPA or laboratory specifications, except where noted in the Case Narrative, or as qualified with flags. Results apply only to the samples analyzed. Without approval of the laboratory, the reproduction of this report is only permitted in its entirety.

If you have any questions regarding these tests, please feel free to call.

Sincerely,

Marty French
Lab Director

Specialty Analytical

Date Reported: 28-Sep-15

CLIENT: EVRAZ
Project: Soil Confirmation Sample/OEM 2015-2126

Lab Order: 1509154

Lab ID: 1509154-001
Collection Date: 9/17/2015 1:15:00 AM
Client Sample ID: EVRAZ-OEM 2015-2126
Matrix: SOIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
NWTPH-DX		**NWTPH-DX**				Analyst: **BS**
Diesel	ND	16.4	A3	mg/Kg-dry	1	9/25/2015 11:09:08 PM
Lube Oil	186	54.6		mg/Kg-dry	1	9/25/2015 11:09:08 PM
Surr: o-Terphenyl	102	50-150		%REC	1	9/25/2015 11:09:08 PM

QC SUMMARY REPORT

WO#: **1509154**

Specialty Analytical

28-Sep-15

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2126 **TestCode:** **NWTPHDX_S**

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**
Client ID: **CCV** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295691**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1040	15.0	999.0	0	104	85	115				
Lube Oil	430	50.0	499.5	0	86.1	85	115				

Sample ID: **MB-10076** SampType: **MBLK** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **PBS** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295692**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.0									
Lube Oil	ND	50.0									
Surr: o-Terphenyl	35.4		33.30		106	50	150				

Sample ID: **LCS-10076** SampType: **LCS** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **LCSS** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295693**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	170	15.0	166.5	0	102	76.3	125				
Lube Oil	173	50.0	166.5	0	104	69.9	127				

Sample ID: **1509160-001ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**
Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295695**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual

Qualifiers:
B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1509154**

Specialty Analytical

28-Sep-15

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2126 **TestCode:** **NWTPHDX_S**

Sample ID: **1509160-001ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**

Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295695**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.8						0	0	20	RF
Lube Oil	ND	52.7						0	0	20	RF

Sample ID: **1509161-013ADUP** SampType: **DUP** TestCode: **NWTPHDX_S** Units: **mg/Kg-dry** Prep Date: **9/23/2015** RunNo: **21999**

Client ID: **ZZZZZZ** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295731**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	16.6						0	0	20	R
Lube Oil	ND	55.2						0	0	20	

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCV** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295732**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	1300	15.0	1332	0	97.4	85	115				
Lube Oil	571	50.0	666.0	0	85.7	85	115				

Sample ID: **CCB** SampType: **CCB** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCB** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295733**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	ND	15.0									

Qualifiers:

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

O RSD is greater than RSDlimit

R RPD outside accepted recovery limits

S Spike Recovery outside accepted reco

QC SUMMARY REPORT

WO#: **1509154**

Specialty Analytical

28-Sep-15

Client: EVRAZ

Project: Soil Confirmation Sample/OEM 2015-2126 **TestCode:** **NWTPHDX_S**

Sample ID: **CCB** SampType: **CCB** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCB** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/25/2015** SeqNo: **295733**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Lube Oil	ND	50.0									
Surr: o-Terphenyl	34.6		33.30		104	50	150				

Sample ID: **CCV** SampType: **CCV** TestCode: **NWTPHDX_S** Units: **mg/Kg** Prep Date: RunNo: **21999**

Client ID: **CCV** Batch ID: **10076** TestNo: **NWTPH-Dx** **SW3545A** Analysis Date: **9/26/2015** SeqNo: **295751**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Diesel	993	15.0	999.0	0	99.4	85	115				
Lube Oil	449	50.0	499.5	0	89.9	85	115				

Qualifiers:

B Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

O RSD is greater than RSDlimit

R RPD outside accepted recovery limits

S Spike Recovery outside accepted reco

KEY TO FLAGS

Rev. May 12, 2010

A	This sample contains a Gasoline Range Organic not identified as a specific hydrocarbon product. The result was quantified against gasoline calibration standards
A1	This sample contains a Diesel Range Organic not identified as a specific hydrocarbon product. The result was quantified against diesel calibration standards.
A2	This sample contains a Lube Oil Range Organic not identified as a specific hydrocarbon product. The result was quantified against a lube oil calibration standard.
A3	The result was determined to be Non-Detect based on hydrocarbon pattern recognition. The product was carry-over from another hydrocarbon type.
A4	The product appears to be aged or degraded diesel.
B	The blank exhibited a positive result great than the reporting limit for this compound.
CN	See Case Narrative.
D	Result is based from a dilution.
E	Result exceeds the calibration range for this compound. The result should be considered as estimate.
F	The positive result for this hydrocarbon is due to single component contamination. The product does not match any hydrocarbon in the fuels library.
G	Result may be biased high due to biogenic interferences. Clean up is recommended.
H	Sample was analyzed outside recommended holding time.
HT	At clients request, samples was analyzed outside of recommended holding time.
J	The result for this analyte is between the MDL and the PQL and should be considered as estimated concentration.
K	Diesel result is biased high due to amount of Oil contained in the sample.
L	Diesel result is biased high due to amount of Gasoline contained in the sample.
M	Oil result is biased high due to amount of Diesel contained in the sample.
MC	Sample concentration is greater than 4x the spiked value, the spiked value is considered insignificant.
MI	Result is outside control limits due to matrix interference.
MSA	Value determined by Method of Standard Addition.
O	Laboratory Control Standard (LCS) exceeded laboratory control limits, but meets CCV criteria. Data meets EPA requirements.
Q	Detection levels elevated due to sample matrix.
R	RPD control limits were exceeded.
RF	Duplicate failed due to result being at or near the method-reporting limit.
RP	Matrix spike values exceed established QC limits; post digestion spike is in control.
S	Recovery is outside control limits.
SC	Closing CCV or LCS exceeded high recovery control limits, but associated samples are non-detect. Data meets EPA requirements.
*	The result for this parameter was greater that the maximum contaminant level of the TCLP regulatory limit.

CHAIN OF CUSTODY RECORD

Specialty Analytical
11711 SE Capps Road
Clackamas, OR 97015
Phone: 503-607-1331
Fax: 503-607-1336

Contact Person/Project Manager: Debbie Deetz Silva
Company: Evraz Inc. NA
Address: 14400 N. Rivergate Blvd. Portland, OR 97203

Phone: 503-978-6044 Fax: 503-978-6042

Project No.: OEM 2015-2126 Project Name: Soil confirmation sample

Project Site Location OR: XXX WA: _____ Other: _____

Invoice To: Accounts Payable - EVRAZ above address P.O. No.: 148521

Collected By:
Signature: Terra Hydr
Printed: Terra Hydr
Signature: Debbie Deetz Silva
Printed: Debbie Deetz Silva

Turn Around Time
☑ Normal 5-7 Business Days
☐ Rush _____
Specify
Rush Analyses Must Be Scheduled With The Lab In Advance

For Laboratory Use
Lab Job No.: 1509154
Shipped Via: SA
Air Bill No.: _____
Temperature On Receipt: AMB °C
Specialty Analytical Containers? ☐/☐
Specialty Analytical Trip Blanks? ☐/☐

Date	Time	Sample I.D.	Matrix	No. of Containers	Analyses: NORTHWEST TPH-DX	Comments	Lab I.D.
9/17/15	1:15AM	EVRAZ - OEM 2015-2126	soil	2	X	please composite the two (2) containers for one (1) sample analysis	

Relinquished By:	Date	Time	Received By:	Relinquished By:	Date	Time
Company: EVRAZ	9/18/15	12:20pm	Company: GA	Company: GA	9-18-15	1350

Unless Reclaimed, Samples Will Be Disposed of 60 Days After Receipt.
Samples held beyond 60 days subject to storage fee(s)

Received For Lab By: _____ Date: 9.18.15 Time: 13:50

Copies: White-Original Yellow-Project File Pink-Customer Copy

Riverbend Landfill
13469 SW HIGHWAY 18,
MCMINNVILLE, OR, 97128-8634
Ph: (503) 472-8788

Reprint Ticket # 1029261

Customer Name	EVRAZ OREGON STEEL	Carrier	CELORIE CELORIE BROTHERS
Ticket Date	10/02/2015	Vehicle#	23 Volume
Payment Type	Credit Account	Container	
Manual Ticket#		Driver	
Hauling Ticket#		Check#	
Route		Billing#	0001071
StateWasteCode		Gen EPA ID	
Manifest	NA	Grid	
Destination			
PO#	152857		
Profile	119035OR(Fuel Oil Impacted Soil/Debris)		
Generator	1756536 OR-EVRAZ OREGON STEEL		

	Time	Scale	Operator	Inbound			
					Gross	103120	lb
In	10/02/15 09:50:32 AM	Inbound	carolj		Tare	39240	lb
Out	10/02/15 10:05:29 AM	Outbound	CAROLJ		Net	63880	lb
					Tons	31.94	

Comments

Products	LD%	Qty	UOM	Rate	Fee	Amount	Origin
Cont Soil Pet-RGC-Tons-Cont. Soil	100	31.94	Tons	[redacted]		[redacted]	MULT-IN ME
TRKF-Trucking Fee	100	31.94	Tons	[redacted]		[redacted]	MULT-IN ME

Total Fees

Driver's Signature _____

Total Ticket [redacted]

TERRA HYDR INC.

October 04, 2015

Ms. Debbie Deetz-Silva
EVRAZ Oregon Steel Mills
14400 N Rivergate Blvd.
Portland OR 97203

RE: Spill Response at Utilities Roadway SE of Pond Bunker (OERS #2015-2126)

At approximately 2030 hours on Wednesday September 16th, Terra Hydr Inc. (THI) responded to a hydraulic oil release at referenced roadway location. We were informed that a tote of hydraulic oil had slipped off of a forklift, and tipped over, releasing approximately 80 gallons of oil. Initial cleanup was completed at approximately 0300 hours on Thursday morning.

THI mobilized a Guzzler NX dry vacuum truck and a ZX-35 hydraulic excavator to evac and excavate residual oil and contaminated rock media. Affected area was approximately 400 foot square. Approximately five cubic yards (5 CY) of PCS was transported to the on-site storage area for disposal by others. An adjacent collection vault was cleaned, with rinsate put into the pond bunker.

Upon inspection of the area, during daylight hours on the 17th, it was determined that no further cleanup activities were required.

Site restoration was completed on the 18th, by supplying and placing approximately eight tons (8 TN) of select import granular rock material, with compaction.

We appreciate the opportunity to be of service to Evraz on this project. Please contact us at your earliest convenience, should you require additional information.

Sincerely,

Henry J Stukey